



# PHILADELPHIA ELECTRIC COMPANY

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JOHN S. KEMPER  
VICE-PRESIDENT  
ENGINEERING AND RESEARCH

APR 14 1982

Mr. Ronald C. Haynes, Director  
United States Nuclear Regulatory Commission  
Office of Inspection and Enforcement, Region I  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Subject: USNRC IE Region I Letter dated March 15, 1982  
RE: Site Inspection of February 1-28, 1982  
Inspection Report No. 50-352/82-04 & 50-353/82-03  
Limerick Generating Station - Units 1 and 2

File: QUAL 1-2-2 (352/82-04 & 353/82-03)

Dear Mr. Haynes:

In response to the subject letter regarding items identified during the subject inspection of construction activities authorized by NRC License Nos. CPPR-106 and -107, we transmit herewith the following:

## Attachment I - Response to Appendix A

Also enclosed as required by the Notice of Violation, is an affidavit relating to the response.

Should you have any questions concerning these items, we would be pleased to discuss them with you.

Sincerely,

JPE/kk/1/2

Attachment

Copy to: Director of Inspection and Enforcement  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555

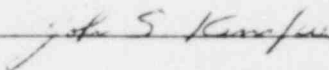
J. P. Durr, USNRC Resident Inspector

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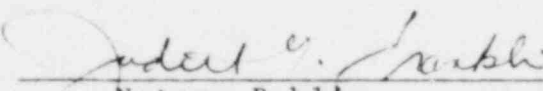
COMMONWEALTH OF PENNSYLVANIA : ss.  
COUNTY OF PHILADELPHIA :

JOHN S. KEMPER, being first duly sworn, deposes  
and says:

That he is Vice President of Philadelphia Electric  
Company, the holder of Construction Permits CPPR-106 and  
CPPR-107 for Limerick Generating Station Units 1 and 2; that  
he has read the foregoing Response to Inspection Report No.  
50-352/82-04 and 50-353/82-03 and knows the contents thereof;  
and that the statements and matters set forth therein are true  
and correct to the best of his knowledge, information and  
belief.

  
\_\_\_\_\_

Subscribed and sworn to  
before me this 14<sup>TH</sup> day  
of APRIL, 1982

  
\_\_\_\_\_  
Notary Public  
Notary Public, Philadelphia, Pennsylvania Co.  
My Commission Expires July 28, 1983.

## ATTACHMENT I

### RESPONSE TO APPENDIX A

#### Violation

During the February 1-28, 1982 inspection and in accordance with the Interim Enforcement Policy, 45FR66754 (October 7, 1980), the following violation was identified:

- A. 10CFR50 Appendix B Criterion III requires that the design basis be translated into instructions, procedures and drawings providing appropriate quality standards and that deviations from such standards be controlled. 10CFR50 Appendix B Criterion VI requires control of the issue of documents and changes which prescribe all activities affecting quality, including review and approval by authorized personnel and use where an activity is performed.

Contrary to the above:

- (1) On February 19, 1982, design changes were found not controlled by Job Rule JR-M-17, "Field Control of Pipe Supports", Paragraph 5.6.1, which permits design changes by field engineers to remain undocumented for from three days to completion of the pipe support.
- (2) On February 9, 1982, the heating, ventilating, and air conditioning subcontractor was using uncontrolled and unreviewed "pick-off" sheets to fabricate safety-related duct work.

#### Response to Violation

1. Design changes during installation of various items at the job site are controlled by various measures, all of which, Philadelphia Electric Company believes, meet the intent of 10CFR50 Appendix B. Although it is our opinion that Job Rule JR-M-17, "Field Control of Pipe Supports", provides effective control of this type of installation, nevertheless, we recognize the NRC concerns and are seeking a mutually acceptable alternate procedure.

It is our understanding that our in-containment practice of "red-lining" changes on drawings until the design is formally incorporated into the drawing is acceptable to the NRC Resident Inspector. Accordingly, we have extended a similar practice into other areas of the plant on a trial basis. Details of implementation are being tested for feasibility and efficiency prior to formalization of the modified procedure.

Response to Violation - Continued

2. Schneider, Inc. has revised their control procedure (Schneider, Inc. PPM-2.5) to include a description of the controls established for the work package "Pick-Off" sheets. This revised procedure now requires that the "Pick-Off" sheet be reviewed by the responsible Schneider group and that each sheet be annotated with the work package control number and page number. This revised procedure is now in use by Schneider.

In addition, Schneider has performed a sample check of 70 previously generated "Pick-Off" sheets to ensure that the requirements of the design documents have been correctly translated. The sample indicated that no discrepancies were found.

Schneider, Inc. is now in full compliance with the revised procedure.