



## PHILADELPHIA ELECTRIC COMPANY

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(215) 841-4502

JOHN S. KEMPER  
VICE PRESIDENT  
ENGINEERING AND RESEARCH

MAY 26 1982

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

Subject: USNRC IE Region Letter dated April 26, 1982  
RE: Site Inspection of April 12-26, 1982  
Inspection Report No. 50-352/82-07 & 50-353/82-05  
Limerick Generating Station, Units 1 & 2

File: QUAL 1-2-2 (352/82-07 & 353/82-05)

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,

Attachment

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

J. P. Durr, USNRC Resident Inspector

COMMONWEALTH OF PENNSYLVANIA :  
COUNTY OF PHILADELPHIA : SS.

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. 50-352/82-07 and 50-353/82-05 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.

John S. Kemper

Subscribed and sworn to  
before me this 26<sup>th</sup> day  
of May 1982

Patricia D. Scholl  
Notary Public

PATRICIA D. SCHOLL  
Notary Public, Philadelphia, Philadelphia Co.  
My Commission Expires February 10, 1986

## ATTACHMENT I

### RESPONSE TO APPENDIX A

#### Violation

10CFR50 Appendix B Criterion V requires that activities affecting quality be carried out in accordance with instructions and procedures. General Electric Specification 22A2724, Revision 3, Paragraph 4 and Table I, Paragraph 5, require that components such as reactor protection instrumentation receive periodic inspection for conditions such as protective covers, seals, and damage; and that controls and instrumentation be protected from dust, dirt, damage and humidity.

Contrary to the above, the turbine stop and control valve scram bypass pressure transmitters PT-01-1N052A through D were not inspected and protected as required: they were deleted from the storage and maintenance program on April 24, 1981 after being partially installed, and their covers and seals were not intact on April 13, 1982.

#### Response To Violation

The four installed turbine stop and control valve scram bypass pressure transmitters, PT-01-1N052A through D, are now adequately protected and have been included in the Storage Maintenance Program. All process lines are capped and the conduit taps are either capped or have the conduit connections in place. The instruments are being stored in-place in accordance with the established requirements.

To prevent recurrence Bechtel Power Corporation has included all installed instruments in the Storage Maintenance Program on May 19, 1982. This program covers both Bechtel and GE instrumentation and meets the requirements of GE Specification 22A2724. Each area and elevation of the plant will have a documented maintenance inspection performed on a monthly basis by Bechtel Quality Control.

The first storage maintenance activity was performed on May 25, 1982.