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LAW OFFICES

CONNER & WETTERHAHN, P.C. '83

1747 PENNSYLVANIA AVENUE, N.W.

WASHINGTON, D.C. 20006

TROY B. CONNER, JR.
MARK J. WETTERHAHN
ROBERT M. RADER

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ARCH A. MOORE, JR.

ROBERT H. PURL

OF COUNSEL

*NOT ADMITTED IN D.C.

June 6, 1983

(202) 833-3500

CABLE ADDRESS: ATOMLAW

Judge Lawrence Brenner
Atomic Safety and
Licensing Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Judge Richard F. Cole
Atomic Safety and
Licensing Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

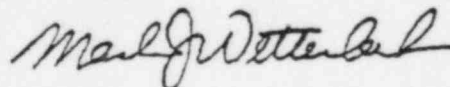
Judge Peter A. Morris
Atomic Safety and
Licensing Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

In the Matter of
Philadelphia Electric Company
(Limerick Generating Station, Units 1 and 2)
Docket Nos. 50-352 and 50-353

Gentlemen:

It has come to my attention that two of the attachments to my May 20, 1983 letter to you may be miscolated or possibly have missing pages. I am therefore sending you new copies of Attachments 2 and 3 to that letter.

Sincerely,



Mark J. Wetterhahn
Counsel for the Applicant

MJW:sdd

cc: Service List

8306090212 830606
PDR ADOCK 05000352
G PDR

DSO3

ATTACHMENT 2

Letter from V. S. Boyer to J. P. O'Reilly, dated 12/15/76

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

PHILADELPHIA, PA 19101

215/641-4500

V. S. BOYER
VICE PRESIDENT

DEC 15 1976

Mr. James P. O'Reilly, Director
United States Nuclear Regulatory Commission
Office of Inspection and Enforcement, Region I
631 Park Avenue
King of Prussia, Pa. 19106

Subject: USNRC IN-1 Letter dated November 10, 1976
Re: Site Inspection of October 16, 19-22, 1976
Inspection Report No. 50-353/76-06
Limerick Generating Station - Unit 2
File: QUA1 1-2-2-2 (76-06)

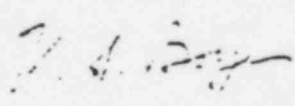
Dear Mr. O'Reilly:

We offer the following responses to the subject letter regarding items identified during the NRC visit to Limerick Generating Station - Unit 2 on October 16, 19-22, 1976 for inspection of construction activities authorized by NRC License No. C298-107.

- Attachment I - Response to Item A of Appendix A of subject letter.
- Attachment II - Response to Item B of Appendix A of subject letter.
- Attachment III - Response to Item C of Appendix A of subject letter.

The due date for this response was extended to December 15, 1976 in a telecon with your staff on December 2, 1976. Should you have any questions concerning these items, we would be pleased to discuss them with you.

Sincerely,



Attachments

ATTACHMENT 1

Response to Item 3 of Attachment 1

Justification

"10 CFR 50, Appendix B, Criterion IV requires in part, 'Measures shall be established to ensure that special processes, including welding, ... are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria and other special requirements.'"

Contrary to the above, the established measures were insufficient to ensure that welding on structural steel on September 22, 1976 was accomplished in accordance with the applicable AWS-D.1.1. The filler welds on structural steel beam connections at elevation 253, columns 23-G and H, did not meet the quality requirements of the AWS Structural Welding Code.

Welding electrode holders were used attached to extension sticks which were not "designed or manufactured so as to enable qualified welders ... to attain the results prescribed" in the AWS code, nor were procedures alternatively qualified to establish that acceptable weld quality could be attained with such sticks. Quality control surveillance inspections conducted and documented did not identify and effect correction of the condition."

"Although the applicable Code AWS D1-1-72 does not specifically address the use of electrode holder extensions with respect to procedure/welder qualifications, it does in Part 3.1.2 require that equipment be designed and manufactured so as to enable qualified welders to attain the results prescribed in the AWS Code."

Response

1. The following corrective measures have been taken:
 - a. The filler welds on structural steel beam connections at elevation 253, columns 23-G and H, have been repaired.
 - b. The inspector, who originally accepted these two welds, is no longer employed by the contractor and a reinspection of all other work

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Response to Item 2 of Appendix A

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7. 6. 2008

1. Corrective steps which have been taken and results achieved:
- a. The deficiency was documented by Section NOX #1981 dated October 22, 1976.
 - b. The exposed surfaces of both the Unit #1 and Unit #2 drywell heads were inspected by Section Quality Control with the following findings:
 1. No evidence of surface damage due to sand-blasting or rust.
 2. Portions of both surfaces show evidence of dry overspray of Amercoat 40.
 - c. As coating of both drywell heads is complete, they will be placed into project storage maintenance program.
2. Corrective steps taken to avoid further items of noncompliance:
- A periodic inspection of the machined surfaces of the drywell heads has been incorporated into the project's storage maintenance program. The action card was entered

Appendix III

Response to Item C of Appendix A

1. Introduction

The purpose of this report is to provide a summary of the actions taken by the Resident Engineer and the Project Engineering to address the concerns raised in Item C of Appendix A. The report is organized as follows:

1. A summary of the concerns raised in Item C of Appendix A.
2. A description of the actions taken by the Resident Engineer and the Project Engineering to address these concerns.
3. A summary of the results of these actions.

2. Concerns

1. Concerns raised by the Resident Engineer and the Project Engineering:

- a. DCN No. 1 to Revision 10 of drawing 8031-C-100 issued October 16, 1976 authorizes the drilling of holes in the top flange of the main beam at location 201' 0" in the beam to support temporary beams.
- b. DCN No. 2 to Revision 10 of drawing 8031-C-100 issued November 11, 1976 authorizes, on a general basis in the beam, drilling and cutting of holes in the top flange of beams and girders in order to support temporary beams.
- c. Project Quality Control Instruction 8031/C-2.10, Revision 1 has incorporated a task to inspect for the removal of temporary beams, its installation, and that the permanent beams were not damaged.
- d. This activity was approved by Project Engineering via a telephone discussion with the Resident Engineer, and a telecon memorandum was prepared on February 6. However, contrary to Project procedures, no PCR was issued or change to the applicable design document made as required for modification of a Q-listed component.

A review has been made of construction actions which have resulted from telephone conversations (telecons) between the Resident Engineer and Project Engineering, and from Resident Engineer Memoranda. Where necessary, PCRs have been initiated to revise the design documents.

ATTACHMENT 3

Letter from Robert T. Carlson to V. S. Boyer dated 12/29/76

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
531 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

December 10, 1976

Philadelphia Electric Company
Attention: Mr. V. S. Boyer
Vice President
Engineering & Construction
1201 Market Street
Philadelphia, Pennsylvania 19101

License No. CFPB-107
Inspection No. 76-06
Docket No. 50-153 -167

Reference: Your letter dated December 15, 1976
in response to our letter dated November 10, 1976

Enclosure:

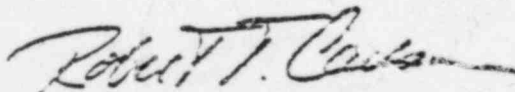
Thank you for informing us of the corrective and preventive actions
you intended to implement to our satisfaction. These actions
will be expected during a subsequent inspection of your licensed
facility.

On December 10, 1976, Mr. A. Tuck of this office and Mr. J. Crockett
of your staff discussed other steps taken to avoid further stress on
the structure of the above mentioned in connection with your above
mentioned facility. We understand that, in addition to the steps taken
regarding the containment dome, other accommodations including items
are being entered into the vessel storage maintenance program when
these are stored or placed in their designated locations in the
plant. Further, we understand that the storage maintenance program
provides planned inspection and inspection which will assure
protection against sandblasting/spray-painting effects.

It is our understanding of these additional corrective measures is
not correct, please advise us accordingly.

Your cooperation with us is appreciated.

Sincerely,



Robert T. Carlson, Chief
Reactor Construction and
Engineering Support Branch

