



PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4502

JOHN S. KEMPER
VICE-PRESIDENT
ENGINEERING AND RESEARCH

APR 4 1983

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: US NRC IE Region I Letter dated March 10, 1983
RE: Site Inspection of January 31 - February 4, 1983
Inspection Report No. 50-352/83-02
Limerick Generating Station - Unit 1

File: QUAL 1-2-2 (352/83-02)

Dear Mr. Haynes:

In response to the subject letter regarding items identified during the subject inspection of construction activities authorized by NRC License No. CPPR-106, we transmit the following:

Attachment I - Response to Appendix A

Also enclosed 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,

JMC/mmk

Attachment

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

S. K. Chaudhary, US NRC Resident Inspector

8304190524 830413
PDR ADOCK 05000352
Q PDR

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 Permit CPPR-106 for Limerick Generating Station Unit 1; that he has read the foregoing Response to Inspection Report No. 50-352/33-02 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 4th day

of April 1983
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 A

10 CFR 50, Appendix B, Criterion III requires that "Design changes, including field charges, shall be subject to design control measures commensurate with those applied to the original design....". Job Rule G-32, Revision 16, paragraph 6.7 requires that the redlining of drawings be done prior to the installation of that portion of the isometric and after review by the Field Instrument Engineer.

Contrary to the above, on February 3, 1983, isometric drawing FJ-42-15, Revision 0, was redlined between hangers 7 and 8 after the installation of that portion of the instrument line.

Response to Violation A

Isometric drawing FJ-42-15, Revision 0 was redlined immediately after the condition was identified.

A review of a sample of other redline drawings was conducted for similar conditions and none were found.

To prevent a recurrence, the appropriate personnel were re-trained in the requirements.

Violation B

10 CFR 50, Appendix B, Criterion III requires that "measures shall be established that applicable regulatory requirements and the design basesare correctly translated into specifications, drawings, procedures and instructions" and that "deviations from such standards are controlled." Specification 8031-M-830-6041, sheet 2 of 2, Revision 10 requires a flex leg of 21 inches on sensing lines crossing seismic gaps which are between elevations 283' and 313'.

Contrary to the above, as of February 4, 1983, isometric drawing FJ-42-15 Revision 0, specifies a flex leg of 18 inches on a sensing line crossing the seismic gap between elevations 283' and 313'.

Response to Violation B

Corrected installation instructions have been issued to correct the identified condition. The installation has been reworked, and now meets the requirements.

To assure no other similar conditions exist, all other drawings using flex legs are being reviewed. This review is expected to be completed by May 28, 1983.

To prevent a recurrence of this, training sessions have been held with the appropriate personnel.