



PHILADELPHIA ELECTRIC COMPANY

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SEP 01 1983

JOHN S. KEMPER
VICE PRESIDENT
ENGINEERING AND RESEARCH

Mr. Thomas E. Murley, Director
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Subject: US NRC IE Letter, dated May 26, 1983
RE: Site Inspection of June 26 - July 30, 1983
Inspection Report No. 50-352/83-10
Limerick Generating Station, Unit 1

File: QUAL 1-2-2 (352/83-10)

Dear Mr. Murley:

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
Attachments

Copy to: Director of Inspection and Enforcement
United States Nuclear Regulatory Commission
Washington, D. C. 2-555

S. K. Chaudhary, US NRC Resident Inspector

8309150278 830908
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. 50-352/83-10 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 1st day

of September 1983

Patricia D. Scholl

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

ATTACHMENT I

RESPONSE TO APPENDIX A

Violation A

10 CFR50, Appendix B, Criterion V, states, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings".

8031-JR-M-17, "Job Rule for Field Control of Pipe Supports (Hangers)", Paragraph 5.5.6 states, "Restraints which utilize a mechanical shock arrestor in its design are normally not installed until the latest possible date or prior to access becoming a problem. This is due to the stringent storage requirements of the shock arrestor". Paragraph 5.3 states, "Maintenance required during storage of hanger materials is described in 'Attachment A' of this Job Rule". Attachment A, under "General" states, "All assemblies are to be left in their original boxes or on skids if storage is indoors".

Contrary to the above, on July 19, 1983, the inspector found two mechanical shock arrestors in the Containment Drywell being inadequately stored prior to installation.

Response to Violation A

The snubber which was on the floor in contact with water (identified as VRR-1RR-H9) has been inspected and stroked with no evidence of damage. This snubber is now properly stored.

The containment was walked down and now there are no improperly stored snubbers. The NRC identified snubbers, as well as several others that were stored in containment, have been placed in a separate area. Each of these snubbers has been inspected and stroked with no evidence of damage.

To prevent a reoccurrence of this condition, an additional requirement has been added to Job Rule M-17 for Field Control of Pipe Support/Hangers, which requires a walkdown every two weeks to check on snubber storage.

Violation B

10 CFR50, Appendix B, Criterion V, states, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings".

8031-JR-G-16, "Job Rule for Welding", Paragraph 5.2.3.9 states, "At no time shall the welder throw his stubs on the ground or the floor". Paragraph 5.2.3.11 states, "At the end of the shift the welder will return his portable container, unused filler material, and stub bucket to the control station".

Contrary to the above, on July 11 and July 19, 1983, the inspector found uncontrolled weld rods of type 7018 filler material in two areas of the Reactor Building and on several elevations within the Primary Containment Drywell.

Response to Violation B

The areas where the discarded weld rods were identified have been cleaned and the discarded weld rods have been disposed of properly.

To prevent the reoccurrence of this, and to reinforce the policy regarding control of weld rods, an instruction was issued which Superintendents, General Foremen, Foremen, and welders were required to sign.