

PHILADELPHIA ELECTRIC COMPANY

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JOHN S. KEMPER
VICE PRESIDENT
ENGINEERING AND RESEARCH

MAY 19 1983

Mr. James M. Allan, Acting Regional Administrator
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 April 28, 1983
RE: Systematic Assessment of Licensee Performance (SALP)

File: GOVT 1-1 (1982 SALP)

Dear Mr. Allan:

As a result of the meeting in Philadelphia Electric Company's office, Philadelphia, PA on May 2, 1983 and our review of the subject report, we offer the following comments.

It is our view that the meeting between the key NRC representatives and Philadelphia Electric Company management was beneficial and improved the mutual understanding of our project management and your inspection program.

Regarding the increased management involvement in the electrical area, we plan the following actions:

1. We will add another Quality Assurance Engineer to audit electrical work.
2. We will implement a Quality Assurance re-audit program with emphasis on areas previously identified by NRC as deficient.

Regarding the increased management involvement and overview to assure regulatory requirements are fulfilled and clear and accurate engineering analyses are performed, we have taken the following action:

1. During 1982, on approximately a quarterly basis, we initiated a management design review team to analyze the AE's design plans and to resolve major engineering items. The full effects and usefulness of this management effort should be realized in 1983.

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Regarding the increased management involvement in the design change area, we plan the following actions:

1. We expect shortly to complete programmatic changes to our drawing change control program. These changes are expected to ensure that changes to approved drawings and design are made with commensurate review and approval.
2. We have recently initiated design change controls for our preoperational phase which we fully expect will support and control the changes which occur during the testing phase of Limerick. These procedures incorporate the lessons learned during the construction phase.
3. During 1983 we expect to formally evaluate the effectiveness of the modifications in design change controls.

In addition, we suggest the following editorial changes to the 1982 Limerick SALP Report:

1. Section 4.2, page 7, fourth paragraph, second line:

Change "deficiencies in the" to "a need to modify". The use of the word "deficiency" implies that there was an original error. The re-analysis of the structural steel based on the new design criteria revealed a need for changes to the design of the structural steel.

2. Section 4.2, page 7, last paragraph, second line:

Change "4.98" to "4.9".

3. Section 4.3, page 9, second paragraph, sixth line:

Change "had been" to "has been"

4. Section 4.9, page 19, item A.7, first line:

Delete "pressure and" and change "valves" to "values".

5. Section 4.9, page 20, item B.1, second line:

Delete "and QC inspection". Our practice, as noted in IR 352/82-04, has been for hanger detail drawing changes to be approved by engineering prior to QC inspection.

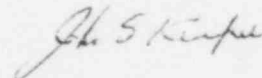
Mr. James M. Allan, Acting Regional Administrator
United States Nuclear Regulatory Commission

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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/drd

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

S. K. Chaudhary, US NRC Resident Inspector

COMMONWEALTH OF PENNSYLVANIA :
 : ss
COUNTY OF PENNSYLVANIA :

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 USNRC Region I Systematic Assessment of Licensee Performance for Limerick Generating Station dated April 18, 1983 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. Kinsler

Subscribed and sworn to
before me this 19th day
of May 1983

Patricia D. Schell

Notary Public

PATRICIA D. SCHOLL

Notary Public, Philadelphia, Philadelphia Co.

My Commission Expires February 10, 1988