

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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OFFICE OF SECRETARY
Before the Atomic Safety and Licensing Board

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

AFFIDAVIT OF VINCENT S. BOYER
SENIOR VICE PRESIDENT, NUCLEAR POWER
PHILADELPHIA ELECTRIC COMPANY

Vincent S. Boyer being first duly sworn according to law
deposes and states:

1. My name is Vincent S. Boyer. I am Senior Vice President,
Nuclear Power, of the Philadelphia Electric Company (Company).
In this position, I have overall responsibility for the nuclear
power activities of the Company, including the Limerick Generating
Station.

2. On August 10, 1983, John S. Kemper, Vice President,
Engineering and Research, executed an affidavit dealing with
the Company's continuing investigation to assure that welds
which in 1976 were the responsibility of a certain Quality
Control inspector had been reinspected or otherwise dispositioned.
The affidavit reflected the fact that the Company had discovered,
contrary to its previous belief, that not all such welds had been
identified. This affidavit provides a progress report on the
ongoing investigation and discusses the findings to date.

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3. The Board's Special Prehearing Conference Order, LBP-82-43A, 15 NRC 1423, 1520-21 (June 1, 1982), provided for informal discovery. Pursuant to that Order, on September 3, 1982 the Air and Water Pollution Patrol (AWPP) requested certain documents relating to NRC Inspection Report 76-06. This request was designated "Discovery 2 (Enclosure 2)." As it relates to this matter, the following documents were requested:

"(7) Provide record of all welds accepted by inspector who accepted welds at elevation 253, columns 23G and H, and provide record showing percentage of welds inspected by inspector in (6) above that were re-inspected."

4. By letter dated January 11, 1983, the documents which had been identified as responsive to this request were made available to AWPP. These documents were later provided to the Board by counsel for the Company on May 20, 1983 pursuant to its Order Regarding Quality Assurance Documents (May 13, 1983). In order to understand the status of the Company's continuing investigation, it is necessary to discuss certain of the documents provided to AWPP and the Board. The same designation of attachments is used as was utilized in the May 20, 1983 letter.

5. A letter from V. S. Boyer to J. P. O'Reilly dated December 15, 1976, designated Attachment 2 stated that, with respect to the structural welds which were cited in NRC Inspection Report 76-06 the corrective action therein was as follows:

"1. The following corrective measures have been taken:

- a. The fillet 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 performed by him has been accomplished, where accessible. Of approximately 350 welds reinspected, two deficiencies were noted and corrective action has been taken."

6. The above-quoted statement was based upon a Bechtel response included as part of Attachment 4, Philadelphia Electric Company Quality Assurance Finding Report No. N-093 dated October 27, 1976. That response at Sheet 2 of 3 states that the following corrective action was taken to resolve the finding:

"A reinspection of all other work performed by the particular inspector who accepted the welds in question was accomplished wherever accessible."

That same page carries the handwritten notation that Bechtel Field Inspection Reports C-63-7 through C-63-19 (identified collectively as Attachment 6) provide the basis for the above quoted statement.

7. Additional welds which were the responsibility of the subject inspector were identified in early 1977. See Bechtel Field Inspection Reports Nos. C-63-20 and C-63-21, collectively identified as Attachment 7.

8. On April 5, 1977, Bechtel Field Inspection Report C-63-22 was initiated in order to redetermine the accessibility for inspection of the installed structural steel beams and columns previously identified in Attachments 6 and 7 to allow further reinspection and assure that all accessible welds were inspected. This Field Inspection Report is identified as Attachment 8.

9. Attachment 9 contains additional Bechtel Field Inspection Reports which were initiated to document further inspections which resulted from the preparation of Bechtel Field Inspection Report C-63-22 (Attachment 8).

10. Page 8 of 8 of Bechtel Field Inspection Report C-63-22 is a reconciliation of all Weld Inspection Plans that had been identified as the responsibility of the subject inspector against the Bechtel Field Inspection reports which indicated that such welds had been reinspected. It was thus concluded by Company personnel on the basis of the Bechtel reports that all welds which had been the responsibility of the subject inspector had been reinspected or analyzed, and a non-conformance report (NCR-2710 referenced in Attachment 9) dispositioned the inaccessible or deficient welds.

11. In preparing its response to the Licensing Board's Second Special Prehearing Conference Order, LBP-83-39, July 26, 1983, and to review independently the validity of the information contained in reports previously submitted to the Board and AWPP, the Company conducted a review of the original quality assurance welding records prepared during the term of employment of subject inspector at the facility. This review took approximately four weeks and 2500 manhours.

12. As a result of this extensive review, it was determined that the subject inspector had responsibility for a total of 709 safety related welds at the facility, of which 662 were structural welds and 47 were on components other than structural

steel, such as hangers (43), pipes (2), and electrical conduit supports (2). It was also determined that the review program which was initiated as a result of NRC Inspection Report 76-06 and completed by the end of July, 1977, resulted in 403 accessible welds having been reinspected with four minor deficiencies noted. Thirty-one welds remained inaccessible but were dispositioned.

13. The remaining 228 structural welds include 16 which are totally accessible and 212 which are partially or totally inaccessible. The 16 totally accessible welds have now been reinspected with one minor deficiency found. An engineering analysis is continuing to disposition the 212 partially or totally inaccessible welds and the one deficient accessible weld. This analysis is expected to be completed in approximately one month. The 47 non-structural welds are all totally accessible and have now been reinspected with 19 minor deficiencies found, all of which are hanger welds. Although these hanger weld deficiencies would be dispositioned normally as part of the final hanger completion and inspection program, they will instead be specially dispositioned within one month.

14. The Company's review of this matter is continuing. The program includes a further physical reinspection of a representative number of the welds for which the subject

inspector was responsible. There are initial indications, not yet confirmed, that some additional deficiencies may be present.

Vincent S. Boyer
Vincent S. Boyer

Sworn to me this 16TH date of September, 1983

James A. Louch
Notary Public
Notary Public, Philadelphia, Philadelphia Co.
My Commission Expires January 29, 1987