

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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. On September 16, 1983, I executed an affidavit which was submitted to the Atomic Safety and Licensing Board dealing with the Company's review of welds which in 1976 were the responsibility of a certain Quality Control inspector. That affidavit indicated that the review was continuing. The purpose of this affidavit is to update and correct information previously reported.

2. To reflect the current status of the review, paragraphs 12 and 13 of the September 16, 1983 affidavit would be modified as set forth below with the reasons for these changes being discussed herewith and in subsequent paragraphs.

12' As a result of this extensive review, it was determined that the subject inspector had responsibility for a total of 1235 safety-related weld inspections at the facility, of which 654 were structural welds and 581 were on components other than

structural steel, such as hangers (577), pipes (2), and electrical conduit supports (2).

13' 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 had identified 426 structural welds, 423 being accessible and 3 inaccessible. The 423 accessible welds were reinspected with 6 minor deficiencies noted. Four of these were reworked, and 2 were found acceptable by engineering analysis. The 3 inaccessible welds were found by engineering analysis to be acceptable.

The extensive August, 1983 review identified 228 additional structural welds, 16 being totally accessible and 212 partially or totally inaccessible. The 16 totally accessible welds have now been reinspected with one minor deficiency found. This weld, together with the 212 partially or totally inaccessible welds, have been found by engineering analysis to be acceptable.

The non-structural welds, totalling 581, are all totally accessible. Of these, 577 represent hanger welds with 534 of the 577 being welds of hangers which were completely reinspected prior to August, 1983 as part of a separate hanger inspection program. The remaining 43 hanger welds for which final inspections had not yet been made, together with the 4 non-hanger welds, have now been reinspected. These hangers contained 19 minor deficiencies which would have normally been dispositioned as part of the final hanger completion and inspection program. They, instead, will be specially dispositioned within one week.

3. The number of structural welds previously reported was reduced from 662 to 654 due to the elimination of 8 welds which, in 1976, were classified as safety-related welds but due to their location and function, were subsequently reclassified as non-safety related welds.

4. In the interest of reporting all possible safety-related welds which could be considered to be the responsibility of the subject inspector, a number of welds which were initially examined by him, but which were subsequently reinspected for programmatic reasons beginning in late 1980, are being included. This explains the increase, noted above, in the number of safety-related non-structural welds from 47 to 581. In December, 1980 a general hanger reinspection program was initiated due to job conditions which resulted in additional hanger work being required after partial inspections had been performed. This reinspection program required a final QC inspection of all welds of all safety-related hangers regardless of their previous inspection status. The subject inspector had made inspections of 534 welds on partially completed hangers which had subsequently been subject to modification and completely reinspected prior to August, 1983. A current reinspection by Philadelphia Electric Company of 60 of these 534 completed hanger welds was performed with one minor deficiency being detected which has been found by engineering analysis to be acceptable.

5. The reported numbers relating to the review program of safety-related structural welds completed by the end of July, 1977 are changed due to the initial inclusion of non-safety grade welds in the inaccessible count and a corresponding error in the breakdown

of the number of accessible and inaccessible welds. The corrected count is that by the end of July, 1977, 423 accessible welds were reinspected (corrected from 403) and 3 inaccessible welds (corrected from 31) were identified and dispositioned satisfactorily where required.

6. The Company's physical reinspection program, as reported in paragraph 14 of the September 16, 1983 affidavit, involved further physical reinspection of 67 safety-related structural welds. Fifteen of these were from the 1983 reinspection group of 16 accessible welds discussed in paragraph 13 of the September 16, 1983 affidavit and 52 were from the 1976/77 reinspection group of 423 accessible welds. Six deficiencies were identified from the latter group, and these have been found by engineering analysis to be acceptable.

Vincent S. Boyer  
Vincent S. Boyer

Sworn to me this 29th date of SEPTEMBER, 1983

Patricia D. Scholl  
Notary Public

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

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicant's Second Interim Report to Licensing Board Relating to Contention VI-1" dated October 4, 1983, in the captioned matter have been served upon the following by deposit in the United States mail this 4th day of October, 1983:

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