

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

APPLICANT'S ANSWERS TO
INTERVENOR AWPP'S FIRST SET OF
INTERROGATORIES ON QUALITY ASSURANCE/CONTROL

DISCOVERY 15
DECEMBER 5, 1983

Interrogatory No. 1

Provide all correspondence or telecon records from the Nuclear Regulatory Commission or any of its agencies, for example, Inspection & Engineering (IE), to Applicant, and Applicant's response(s) directly or indirectly relating to welding infractions at Limerick from 1974 to present.

Answer

Correspondence between Applicant and the U.S. Nuclear Regulatory Commission relating to I&E inspections at Limerick which identified infractions have been previously provided under Discovery 14, Item 1 and is available for inspection and copying under that discovery designation.

Correspondence between Applicant and NRC relating to welding and welding procedure infractions are available for inspection and copying (Discovery 15, Item 1). This information was previously provided under Discovery 2, Enclosure 2, Items 1, 2, and 3 and has been updated to include correspondence between Applicant and NRC since this information was originally provided.

Telecon records relating to NRC inspections relating to welding and welding procedure infractions are available for inspection and copying (Discovery 15, Item 1).

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Interrogatory No. 2

Provide all correspondence or telecon records from NRC, to and from Bechtel Corporation re welding infractions (including Bechtel sub-contractors).

Answer

No correspondence or telecon records between NRC and Bechtel Power Corporation or its subcontractors relating to welding infractions at Limerick have been identified.

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Interrogatory No. 3

Provide all documents, work records, and correspondence from the NRC, via IE reports on welding infractions in which "use as is" disposition was used with or without NRC approval.

Answer

Documents, correspondence and work records relating to welding infractions identified by NRC in Inspection Reports involving welding done at Limerick and which were dispositioned "use as is" are available for inspection and copying. (Discovery 15, Item 3). See also Discovery 14, Item 7 relating to the dispositioning of IE 76-06.

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Interrogatory No. 4

Re 76-06-01*, give names of craft and supervision personnel that "revealed plan to perform welding with the electrode fastened to a broomstick". *(NRC-IE 76-06-01-Failure to Weld Structural Steel Per AWS Code.)

Answer

The craft and supervision personnel with the welding with the electrode fastened to an extension were: J. Windsor, Bechtel, Structural Steel and Rigging, Superintendent; R. Johnson, Bechtel, General Foreman, Ironwork; R. Seisle, Bechtel, Foreman, Ironwork; G. P. Auclair, Bechtel, Welder.

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Interrogatory No. 5

Re 76-06-01 give names of licensee, and contractor Q.A. and Q.C. personnel who confirmed that welding was performed using broomsticks.

Answer

The use of broomstick extensions to perform welds was confirmed by:

J. M. Corcoran, Field Quality Assurance Branch Head
Philadelphia Electric Company

E. R. Klossin, Lead Site Q.A.
Bechtel

K. Bishop, Lead Welding Quality Control Engineer
Bechtel

W. Driver, Assistant Lead Welding Quality Control Engineer
Bechtel

L. McNamara, Welding Quality Control Engineer
Bechtel

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Interrogatory No. 6

Re 76-06-01 give name(s) of qualified and unqualified welders that used unqualified extensions above.

Answer

The welder who performed the welds identified in 76-06-01 using an extension was a qualified welder, G. P. Auclair. No unqualified welders were involved.

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Interrogatory No. 7

Re 76-06-01, how many welds were performed at all locations detailed under 76-06-01?

Answer

Inspection Report 76-06-01 relates to two beam connections (Beam mark numbers 232B7 and 232B9) which are located in Area 13 near elevation 253", near column line 23 and respectively approximately 6'-5" south of H line and 6'-9" north of F line. The location of the two welded beam connections described above is circled on drawings (C-193, Rev. 17 and C-201 Rev. 8) which are available for inspection and copying. (Discovery 15, Item 7)

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Interrogatory No. 8

Did applicant design and manufacture equipment as required by AWS, D-1-1-72, under Part 3.1.2 so as to enable qualified welders to meet the AWS Code?

Answer

Applicant has not designed or manufactured equipment described in AWS, D1.1-72 under Part 3.1.2. Any such equipment needed for use at Limerick would be procured from a vendor of such equipment.

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Interrogatory No. 9

Under 76-06-01, what is the name of the person who is represented as the "licensee" who "disagreed" re need for "visual inspection of the limited access welds performed at elevation 253' on steel beam piece numbers 232B7"?

Answer

Applicant does not agree with AWPP's characterization of the portion of the Inspection Report identified in this interrogatory. The Licensee did not disagree with the need for visual inspection of the limited access welds at elevation 253' on steel beam piece number 232B7. When the inspector requested provisions to permit visual inspection, such provisions were made. The licensee representative, J. M. Corcoran, disagreed with the inspector's statements on the need for certain qualification tests.

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Interrogatory No. 9.5

Re 10 CFR 2.790 (a) and 2.790 (b) (1), supply all written applications asking to withhold information contained in NRC violations involving welding at Limerick.

Answer

Applicant made no applications to the NRC as provided for in 10 CFR 2.790 requesting to withhold information contained in NRC violations involving welding at Limerick or Applicant's responses thereto.

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Interrogatory No. 10

Under 76-06-01, how many welds were involved in "the weld joints designated #3 in the record drawings of the in-process check list"?

Answer

The section of 76-06-01 quoted in the interrogatory refers to one welded beam end connection for beam mark number 232B7 located in Area 13 near elevation 253', near column line 23 and approximately 6'-5" south of H line. The location is shown on a copy of a record drawing C-41A-515-3 (from Bechtel QC Inspection record C-201-W-1-8), which is available for inspection and copying. (Discovery 15, Item 10).

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Interrogatory No. 11

Under 76-06-01, as it relates to (10) above, who was the Bechtel Quality Control inspector involved with checking off "all inspection items, including "Final Quality Verification"? Was he separated from employment by Bechtel and/or Applicant in 1976?

Answer

The Quality Control Inspector involved in the cited Inspection Report was V. C. Ferretti, who was employed by Bechtel Power Corporation until his separation in 1976.

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Interrogatory No. 12

Re 76-06-01, what part of AWS-D-1-1 Section 6 did the Quality Control Inspector not comply with?

Answer

NRC inspection report 353-76-06, Item 76-06-01 Page 5, does not refer to specific paragraph numbers in its reference to Section 6 of AWS D1-1. It appears from the description of 76-06-01 on Page 5 of 353-76-06 that the AWS D1-1, Section 6, paragraphs of interest to the NRC inspector would be 6.3.2, 6.5.1, and 6.5.5.

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Interrogatory No. 13

Please provide following documentation re 76-06-01: QCIR-C-201-W-1-8; C-41A-515-3; QCIR-C-204-W-1-2; Q-41A-657-3; PI-A_Lh; Q.C. In-Process Check Off-sheet-Welding, C-201-W-1-8.

Answer

While all of the information requested has been provided previously, except for certain drawings where only the relevant portions were reproduced, the documents requested are available for inspection and copying. (Discovery 15, Item 13).

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Interrogatory No. 14

Please provide affidavits from supervisors, and inspectors of P.E., NRC, and Bechtel that the infractions such as in 76-06-01 did not take place at other construction locations at Limerick.

Answer

Applicant is aware of one other instance such as identified in NRC Inspection Report 50-353/76-06, Item 76-06-01 where an unqualified extension was used in welding at the Limerick site. Documents related to this instance are available for inspection and copying (Discovery 15, Item 14). To the best of Applicant's knowledge, all infractions such as those identified in item 76-06-01 relating to welding on safety-related structures, systems or components have been identified and appropriately dispositioned. Applicant is not aware of any such infractions which have not been identified and appropriately dispositioned.

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Interrogatory No. 15

Re audits of welding quality records discussed under 5 (a), page 11, of Summary of Findings, Inspection 50-353-76-06, what audit findings did inspector observe that required that "corrective action was documented"?

Answer

Audits and associated findings listed in NRC Inspection Report 50-353-76-06 on page 11 under 5 (a) are available for inspection and copying (Discovery 15, Item 15).

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COMMONWEALTH OF PENNSYLVANIA

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ss.

COUNTY OF PHILADELPHIA

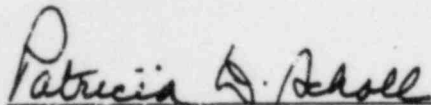
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V. S. Boyer, being first sworn, deposes and states:

That he is Senior Vice President of Philadelphia Electric Company, the Applicant herein; that he has read the foregoing Applicant's Answers to Intervenor AWPP's First Set of Interrogatories on Quality Assurance/Control 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.


Senior Vice President

Subscribed and sworn to
before me this 2nd day
of December, 1983.


Notary Public

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