

PHILADELPHIA ELECTRIC COMPANY

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DEC 5 1983

JOHN S. KEMPER
VICE-PRESIDENT
ENGINEERING AND RESEARCH

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

Subject: USNRC IE Region Letter dated November 3, 1983
RE: Site Inspection of September 3 - October 15, 1983
Inspection Report No. 50-352/83-13 & 50-353/83-06
Limerick Generating Station - Units 1 and 2

File: QUAL 1-2-2 (352/83-13 and 353/83-06)

Dear Mr. Murley:

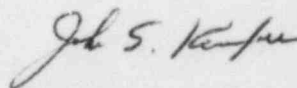
In response to the subject letter regarding items identified during the subject inspection of construction activities authorized by NRC License Nos. CPPR-106 and -107, we transmit herewith the following:

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,



JPE/drd/831116-1

Attachment

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

S. K. Chaudhary, USNRC Resident Inspector

8405070387 840430
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 Permits CPPR-106 and CPPR-107
for Limerick Generating Station Units 1 and 2; that he has read
the foregoing Response to Inspection Report No. 50-352/83-13 and
50-353/83-06 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 5th day
of Dec., 1983

Patricia A. Jones
Notary Public

PATRICIA A. JONES
Notary Public, Phila., Phila. Co.
My Commission Expires Oct. 13, 1986

ATTACHMENT I

RESPONSE TO APPENDIX A

VIOLATION A

Criterion V of 10CFR50, Appendix B requires that activities affecting quality shall be accomplished in accordance with appropriate procedures.

AD6.10-2, Revision 2, dated September 9, 1983 describes those activities necessary for the implementation of a preventive maintenance program during startup and requires that preventive maintenance requirements be specified for each system at the time of system turnover from construction.

Contrary to the above, as of October 14, 1983, activities necessary for implementation of the preventive maintenance program were not completed in accordance with AD6.10-2 in that preventive maintenance requirements were not formally specified for at least five safety-significant systems which had been turned-over to Startup since about July 1983.

RESPONSE TO VIOLATION A

A review of Turned-Over Systems is being performed by Startup. For equipment identified with missing maintenance sheets, maintenance sheets are being added. Delinquent maintenance will be evaluated for effect upon operability and quality. Additional maintenance will be performed as appropriate. This corrective action will be completed by 12/31/83.

As an interim preventive measure, administrative controls in the form of a Pre-Turnover Review Checklist have been implemented. Training on these procedural requirements has been conducted. A forthcoming revision to the Startup Administrative Procedure will be issued to achieve full compliance by 12/31/83.

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50-352/83-13
50-352/83-06