

## PHILADELPHIA ELECTRIC COMPANY

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MAR 14 1984

JOHN S. KEMPER  
VICE-PRESIDENT  
ENGINEERING AND RESEARCH

Mr. Thomas E. Murley, 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 February 13, 1984  
Systematic Assessment of Licensee Performance (SALP)

File: GOVT 1-1 (1983 SALP)

Dear Mr. Murley:

As a result of our meeting in the Limerick Training Center on February 24, 1984, and our review of the subject report, we offer the following comments:

We believe that the meeting between key NRC representatives and Philadelphia Electric Co. management was beneficial and improved the mutual understanding of our project and the NRC evaluation of it.

We have reviewed the 1983 NRC SALP Report and are very pleased with the assessment of the Design and Construction activities. For several years we have made it a practice to review the SALP Report in detail and to devise what we called a "SALP Improvement Program". We think these programs have been extremely beneficial to the Project, and judging by the improvement in our SALP ratings in the last two years, the NRC also finds that our effort has been effective.

We plan to take a similar approach this year. We recognize that even though our Design and Construction activities have improved, there is still room for improvement. We will continue to strive for excellence, and I can assure you that PECO Management's commitment.

In the Engineering Area, all of the NRC concerns have been addressed, and we agree with the NRC observation that the identified problems appear to be isolated instances. Our review of each item considers possible generic implications. For instance, the review of the first item, concerning the adequacy of the seismic flex leg in an instrument installation, included reviewing the other disciplines, electrical, piping, civil, etc. for similar problems, and none were found. This fact, together with the recent resolution of item A3, by further Engineering explanations rather than re-analysis or rework, gives us a further degree of confidence that the project does not have a potential weakness in the engineering area.

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However, in sharing your concern, we propose to again review the problems and our responses to be certain that we have addressed the root causes and that these problems taken together do not constitute a weakness in the overall Engineering effort.

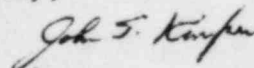
In the Design Change Control area, in view of the recurrent nature of some of the problems, we concur with your concern. Accordingly, we will institute a review of the Design Change Procedures currently in use by the Project with the goal of simplifying and consolidating the procedures in order to minimize the potential for recurring problems of the type previously experienced.

Regarding the need for increased management attention in the area of supporting the preoperational effort and providing a coordinated approach to plant staff readiness for fuel loading, we have already taken action in this area. We will continue to monitor this area carefully to support a proper and coordinated effort to complete the testing and assure plant readiness for operation. In our initial test efforts in mid 1983, the Reactor Pressure Vessel hydro test and the plant integrated system flush were accomplished on an accelerated schedule. Considering these early successes, the overall schedule was advanced late in 1983. The analysis of the overall progress on the schedule at the end of 1983 revealed that an adjustment was required. Recently, the tentative advanced fuel load date of May, 1984 was re-forecast to July, 1984. In addition, to support this effort schedulers and planners have been added to develop detailed and sequenced schedules to ensure that proper support is provided when and where required to meet the revised schedule.

Should you have any questions concerning these items, we would be pleased to discuss them with you.

An affidavit relating to this response is enclosed.

Sincerely,



JMC/drd

Enclosure

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

S. K. Chaudhary, US NRC Resident Inspector  
J. Wiggins, US NRC Resident Inspector

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF PHILADELPHIA :

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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 February 13, 1984 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 14<sup>th</sup> day  
of March 1984.

Patricia D. Scholl

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