



## PHILADELPHIA ELECTRIC COMPANY

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JOHN S. KEMPER  
VICE-PRESIDENT  
ENGINEERING AND RESEARCH

APR 19 1984

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

Subject: US NRC IE Letter, dated November 10, 1976  
Site Inspection of October 16, 19-22, 1976  
Inspection Report No. 50-353/76-06  
Limerick Generating Station, Unit 2

Reference: V. S. Boyer letter to J. P. O'Reilly  
Dated December 15, 1976  
J. S. Kemper Letter to T. E. Murley  
Dated October 11, 1983

File: QUAL 1-2-2 (353/76-06)

Dear Mr. Murley:

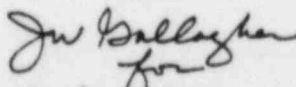
In addition to the response to the subject letters regarding the items identified during the subject inspection of construction activities authorized by NRC License No. CPPR-107, we transmit the following supplementary information:

Attachment I - Second Supplementary Response to Appendix A

Also enclosed is an affidavit relating to the response.

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

Sincerely,

  
J. S. Kemper

JMC:am  
Attachments  
Copy to:

Director of Inspection and Enforcement  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555

C. K. Chaudhary, US NRC Resident Inspector

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## ATTACHMENT I

### SECOND SUPPLEMENTARY RESPONSE TO APENDIX A - ITEM A

The Supplementary Response provided herein is to supply information and details equivalent to the details provided to the Atomic Safety and Licensing Board (ASLB) and to summarize Philadelphia Electric Company's evaluation of the activities associated with 353/76-06-01 items as well as the overall quality of welding activities.

The re-review conducted by Philadelphia Electric Company in 1983 determined that the subject inspector had responsibility for a total of 1,235 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).

It was also determined that the Bechtel 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, were expeditiously dispositioned to resolve this matter.

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.

In addition to the above described Bechtel reinspections Philadelphia Electric Company Quality Assurance performed surveillances which involved further physical reinspection of 67 safety-related structural welds and 60 hanger welds which were originally inspected by the subject inspector and subsequently reinspected by other Bechtel Quality Control inspectors.

These surveillances identified six minor deficiencies on structural steel welds and one minor deficiency on a hanger weld. These have been found by engineering analysis to be acceptable for "Use-As-Is". An engineering evaluation to determine the significance of the identified conditions was also performed. This evaluation concluded that since the design of welded connections conservatively allows for minor variations, the type of deficiencies identified have no effect on the safety of the plant.

Philadelphia Electric Company's surveillances were audits of the Bechtel QC reinspections which were performed by a cross-section of Bechtel QC inspectors. The results of the surveillance have demonstrated the effectiveness of the Limerick Weld Inspection Program.

COMMONWEALTH OF PENNSYLVANIA :

SS:

COUNTY OF PHILADELPHIA :

Joseph W. Gallagher, being first duly sworn, deposes and says:

That he is Manager of Engineering & Research Department of Philadelphia Electric Company, the holder of Construction Permit CPPR-107 for Limerick Generating Station - Unit 2; that he has read the foregoing Second Supplementary Response to Inspection Report No. 50-353/76-06 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.

Joe Gallagher

Subscribed and sworn to

before me this 19<sup>th</sup> day  
of April, 1984.

James D. Lynch  
Notary Public, Philadelphia, Philadelphia Co.

My Commission Expires

January 29, 1987