

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4000

FEB 17 1984

ENGINEERING AND RESEARCH DEPARTMENT

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 I Letter dated January 10, 1984
RE: Site Inspection of October 17-November 30, 1983
Inspection Report No. 50-352/83-19 & 50-353/83-07
Limerick Generating Station - Units 1 and 2

File: QUAL 1-2-2 (352/83-19 & 353/83-07)

Dear Mr. Murley:

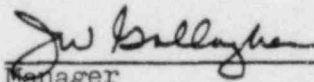
In response to the subject letter regarding items identified during the subject inspection of construction activities authorized by NRC License Nos. CPPR-106 and 107, we transmit herewith the following:

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,



Manager
Engineering & Research Department

JPE/drd/840130-3

Attachment

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

S. K. Chaudhary, USNRC Resident Inspector

8405300558 840521
PDR ADOCK 05000352
Q PDR

COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF PHILADELPHIA : ss.

JOSEPH W. GALLAGHER, being first duly sworn, deposes
and says:

That he is Manager, Engineering and Research Department
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.
50-352/83-19 and 50-353/83-07 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.

Joseph W. Gallagher

Subscribed and sworn to
before me this 17th day
of February 1984

Patricia D. Scholl
Notary Public

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

RESPONSE TO APPENDIX A

VIOLATION I

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality be prescribed by appropriate procedures and accomplished in accordance with these procedures.

Bechtel Power Corporation, Job Rule M-21 is the procedure established to provide direction to construction personnel regarding cleanliness controls on systems which have been turned-over to the licensee's Startup Organization.

Contrary to the above, as of November 30, 1983, Job Rule M-21 had not been effectively implemented as evidenced by the failure to provide suitable cleanliness controls following disassembly of a feedwater system containment isolation valve HV41-1F010A. The valve body was open, the internal surfaces of the valve and its attached piping were exposed to the containment environment, and standing water of undetermined quality had accumulated in the valve.

RESPONSE TO VIOLATION I

Cleanliness controls associated with the identified valve and for Startup Work Orders in progress at that time were corrected as necessary to identify cleanliness requirements to meet the requirements of Job Rule M-21.

To prevent recurrence of this condition, several actions have been taken:

- 1) Post Turnover Maintenance field engineers, superintendents, and craft personnel have been reinstructed in the requirements of Job Rule M-21 (Performing Work on Flushed Systems).
- 2) Job Rules which contain references to Post Turnover Maintenance have been revised to also apply to Startup Work Orders.
- 3) A Quality Control Engineer has been assigned full time to oversee construction and housekeeping practices associated with the requirements of Job Rule M-21.

RESPONSE TO APPENDIX A

VIOLATION 2

10 CFR 50, Appendix B, Criterion X requires the establishment of a program that assures that examinations, measurements, or tests of materials or products processed be performed for each work operation where necessary to assure quality.

Section 17.2A.10 of the Final Safety Analysis Report and Volume I, Section 10 of the Limerick Generating Station Quality Assurance Plan establish this program.

Contrary to the above, the program established for engineering and quality inspection of pipe support hangers failed to assure the quality of two safety-related hangers in that, as of November 7, 1983, hangers VRR-IRS-HHA-1 and HHB-1, for the reactor recirculation system suction piping were inadequately designed and installed and the inadequacies were not identified during the engineering and quality inspections which had been completed.

RESPONSE TO VIOLATION 2

The interferences identified by the Inspector did not develop until after Field Engineering and QC acceptance of HHB-1 and Field Engineering release for pre-ops of HHA-1. These interferences developed as a result of the vibration caused by the recirc pump operation. However, subsequent to the interferences developing, Field Engineering performed rework on hanger HHB-1 which QC inspected. The rework was limited and did not involve the interfering members of the support. The interferences were not identified because of the apparently limited inspection of the reworked hanger.

The Inspector identified interferences have been resolved by implementing an option which was included in an FDDR prior to the interference being identified. The option was not used during initial installation because the Field Engineers did not foresee the development of the interferences.

To determine the extent of this condition QC completed inspections of the 24 GE designed recirculation and main steam hangers. These inspections identified several nonconformances, the majority of which result from the lack of installation tolerances. Investigation into the cause of these nonconformances is not complete. Therefore, a follow-up response to this violation will be made by 3/31/84.

RESPONSE TO APPENDIX A

VIOLATION 3

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality be prescribed by documented procedures and accomplished in accordance with the established procedures.

Project procedure PSP-G-3.1 specifies nonconformance reporting requirements and permits only one nonconforming condition to be reported in each nonconformance report (NCR).

Contrary to the above, the project procedure for NCR reporting was not followed in that, as of November 30, 1983, NCR 6507 was revised to include additional nonconformances.

RESPONSE TO VIOLATION 3

The additions made to Nonconformance Report (NCR) No. 6507, although admittedly not provided for in the existing procedure, did document the nonconforming conditions and associated dispositions to adequately meet the requirements of 10 CFR 50, Appendix B, Criterion XV.

To prevent recurrence and to provide for the various situations encountered during the processing of Nonconformance Reports (NCR's), Project Procedure PSP-G-3.1 was revised to provide for reprocessing the original NCR if the existing condition was not resolved or if a new condition was created by the disposition. The PSP was also revised to require a new NCR be generated when additional nonconforming items are discovered. The exact instructions in the PSP are:

"If 'Rework' or 'Repair' performed to the original disposition did not satisfactorily resolve the existing condition or created a new condition, the Construction Quality Control Engineer performing the reinspection shall document the results as a revision to block 19 of the NCR form, and reprocess the NCR for additional disposition.

If additional nonconforming items are discovered as a result of the reinspection, a new Nonconformance Report shall be initiated. The Quality Control Engineer performing the reinspection shall use discretion in determining which of the above conditions applies. Any question shall be resolved by the responsible lead discipline Quality Control Engineer."

Additional training has been given on the above matter.

I 3/3
352/83-19
353/83-07

FEB 17 1984

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 I Letter dated January 10, 1984
RE: Site Inspection of October 17-November 30, 1983
Inspection Report No. 50-352/83-19 & 50-353/83-07
Limerick Generating Station - Units 1 and 2

File: QUAL 1-2-2 (352/83-19 & 353/83-07)

Dear Mr. Murley:

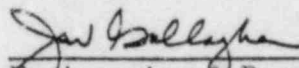
In response to the subject letter regarding items identified during the subject inspection of construction activities authorized by NRC License Nos. CPPR-106 and 107, we transmit herewith the following:

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,



Engineering & Research Department
Manager

2016-16 54
JPE/drd/840130-3

Attachment

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

S. K. Chaudhary, USNRC Resident Inspector

RESPONSE TO APPENDIX A

VIOLATION I

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality be prescribed by appropriate procedures and accomplished in accordance with these procedures.

Bechtel Power Corporation, Job Rule M-21 is the procedure established to provide direction to construction personnel regarding cleanliness controls on systems which have been turned-over to the licensee's Startup Organization.

Contrary to the above, as of November 30, 1983, Job Rule M-21 had not been effectively implemented as evidenced by the failure to provide suitable cleanliness controls following disassembly of a feedwater system containment isolation valve HV41-1F010A. The valve body was open, the internal surfaces of the valve and its attached piping were exposed to the containment environment, and standing water of undetermined quality had accumulated in the valve.

RESPONSE TO VIOLATION I

Cleanliness controls associated with the identified valve and for Startup Work Orders in progress at that time were corrected as necessary to identify cleanliness requirements to meet the requirements of Job Rule M-21.

To prevent recurrence of this condition, several actions have been taken:

- 1) Post Turnover Maintenance field engineers, superintendents, and craft personnel have been reinstructed in the requirements of Job Rule M-21 (Performing Work on Flushed Systems).
- 2) Job Rules which contain references to Post Turnover Maintenance have been revised to also apply to Startup Work Orders.
- 3) A Quality Control Engineer has been assigned full time to oversee construction and housekeeping practices associated with the requirements of Job Rule M-21.

RESPONSE TO APPENDIX A

VIOLATION 2

10 CFR 50, Appendix B, Criterion X requires the establishment of a program that assures that examinations, measurements, or tests of materials or products processed be performed for each work operation where necessary to assure quality.

Section 17.2A.10 of the Final Safety Analysis Report and Volume 1, Section 10 of the Limerick Generating Station Quality Assurance Plan establish this program.

Contrary to the above, the program established for engineering and quality inspection of pipe support hangers failed to assure the quality of two safety-related hangers in that, as of November 7, 1983, hangers VRR-IRS-HHA-1 and HHB-1, for the reactor recirculation system suction piping were inadequately designed and installed and the inadequacies were not identified during the engineering and quality inspections which had been completed.

RESPONSE TO VIOLATION 2

The interferences identified by the Inspector did not develop until after Field Engineering and QC acceptance of HHB-1 and Field Engineering release for pre-ops of HHA-1. These interferences developed as a result of the vibration caused by the recirc pump operation. However, subsequent to the interferences developing, Field Engineering performed rework on hanger HHB-1 which QC inspected. The rework was limited and did not involve the interfering members of the support. The interferences were not identified because of the apparently limited inspection of the reworked hanger.

The Inspector identified interferences have been resolved by implementing an option which was included in an FDDR prior to the interference being identified. The option was not used during initial installation because the Field Engineers did not foresee the development of the interferences.

To determine the extent of this condition QC completed inspections of the 24 GE designed recirculation and main steam hangers. These inspections identified several nonconformances, the majority of which result from the lack of installation tolerances. Investigation into the cause of these nonconformances is not complete. Therefore, a follow-up response to this violation will be made by 3/31/84.

RESPONSE TO APPENDIX A

VIOLATION 3

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality be prescribed by documented procedures and accomplished in accordance with the established procedures.

Project procedure PSP-G-3.1 specifies nonconformance reporting requirements and permits only one nonconforming condition to be reported in each nonconformance report (NCR).

Contrary to the above, the project procedure for NCR reporting was not followed in that, as of November 30, 1983, NCR 6507 was revised to include additional nonconformances.

RESPONSE TO VIOLATION 3

The additions made to Nonconformance Report (NCR) No. 6507, although admittedly not provided for in the existing procedure, did document the nonconforming conditions and associated dispositions to adequately meet the requirements of 10 CFR 50, Appendix B, Criterion XV.

To prevent recurrence and to provide for the various situations encountered during the processing of Nonconformance Reports (NCR's), Project Procedure PSP-G-3.1 was revised to provide for reprocessing the original NCR if the existing condition was not resolved or if a new condition was created by the disposition. The PSP was also revised to require a new NCR be generated when additional nonconforming items are discovered. The exact instructions in the PSP are:

"If 'Rework' or 'Repair' performed to the original disposition did not satisfactorily resolve the existing condition or created a new condition, the Construction Quality Control Engineer performing the reinspection shall document the results as a revision to block 19 of the NCR form, and reprocess the NCR for additional disposition.

If additional nonconforming items are discovered as a result of the reinspection, a new Nonconformance Report shall be initiated. The Quality Control Engineer performing the reinspection shall use discretion in determining which of the above conditions applies. Any question shall be resolved by the responsible lead discipline Quality Control Engineer."

Additional training has been given on the above matter.

I 3/3
352/83-19
353/83-07

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4000

March 26, 1984

Mr. Thomas E. Murley, Director
United States Nuclear Regulatory Commission
Office of Inspection and Enforcement, Region 1
631 Park Avenue
King of Prussia, Pa. 19406

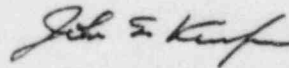
Subject: US NRC IE Region 1 Letter dated January 10, 1984
Re: Site Inspection of October 17-November 30, 1983
Inspection Report No. 50-352/83-19 and 50-353/83-07
Reference: J. S. Kemper Letter to T. E. Murley, dated 2/17/84
File: QUAL 1-2-2 (352/83-19)

Dear Mr. Murley:

In our response to Violation 2 of Inspection Report No. 50-352/83-19 we committed to a follow-up response by 3/31/84. However, the corrective action stated in our previous response has not yet been completed. We now expect to complete the corrective actions by 6/30/84 and will inform you of our progress at that time.

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

Sincerely,



J. S. Kemper

FJC:ar

cc: S. K. Chaudhary, NRC Resident Inspector (Limerick)
J. T. Wiggins, NRC Resident Inspector (Limerick)

~~8404190235~~