



APPL EX 58

REF: 12

DEC 15 1976

Mr. James P. O'Reilly, Director
United States Nuclear Regulatory Commission
Office of Inspection and Enforcement, Region I
631 Park Avenue
King of Prussia, Pa. 19406

Subject: USNRC IX:I Letter dated November 10, 1976
Re: Site Inspection of October 16, 19-22, 1976
Inspection Report No. 58-353/76-06
Limerick Generating Station - Unit 2
File: QUAL 1-2-2-7 (76-06)

Dear Mr. O'Reilly:

We offer the following responses to the subject letter regarding items identified during the NRC visit to Limerick Generating Station - Unit 2 on October 16, 19-22, 1976 for inspection of construction activities authorized by NRC License No. CTPR-107.

- Attachment I - Response to Item A of Appendix A of subject letter.
- Attachment II - Response to Item B of Appendix A of subject letter.
- Attachment III - Response to Item C of Appendix A of subject letter.

The due date for this response was extended to December 15, 1976 in a telecon with your staff on December 2, 1976. Should you have any questions concerning these items, we would be pleased to discuss them with you.

Sincerely,

Attachments

JBC:cm

Copy to:

V. S. Boyer
J. S. Kemper
E. J. Bradley
G. White
R. H. Logue
R. A. Mulford
H. B. Winitsky/Local File
A. Teller, Bechtel (303)
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ATTACHMENT I

Response to Item A of Appendix A

Deficiency

"10 CFR 50, Appendix B, Criterion IX requires in part, "Measures shall be established to assure that special processes, including welding, ... are controlled and accomplished by qualified personnel using qualified procedure in accordance with applicable codes, standards, specifications, criteria and other special requirements."

Contrary to the above, the established measures were insufficient to assure that welding of structural steel on September 22, 1976 was accomplished in accordance with the applicable AWS-D.1.1. The fillet welds on structural steel beam connections at elevation 253, columns 23-G and H, did not meet the quality requirements of the AWS Structural Welding Code.

Welding electrode holders were used attached to extension sticks which were not "designed or manufactured so as to enable qualified welders ... to attain the results prescribed" in the AWS code, nor were procedures alternatively qualified to establish that acceptable weld quality could be attained with such sticks. Quality control surveillance inspections conducted and documented did not identify and effect correction of the condition."

"Although the applicable Code AWS D1-1-72 does not specifically address the use of electrode holder extensions with respect to procedure/welder qualifications, it does in Part 3.1.2 require that equipment be designed and manufactured so as to enable qualified welders to attain the results prescribed in the AWS Code."

Response

1. The following corrective measures have been taken:
 - a. The fillet welds on structural steel beam connections at elevation 253, columns 23-G and H, have been repaired.
 - b. The inspector, who originally accepted these two welds, is no longer employed by the contractor and a reinspection of all other work

353/76-06
ATT I/1

performed by him has been accomplished, where accessible. Of approximately 350 welds re-inspected, two deficiencies were noted and corrective action has been taken.

2. Action taken to prevent recurrence:

- a. A training class was conducted October 25, 1976 for re-indoctrination and re-orientation in the various aspects of acceptance of completed work, reviewing of inspection criteria, and the responsibilities of welding inspectors. All QC and field welding personnel were required to attend this training class.
- b. A Project Control Memorandum, PCM-239, was issued prohibiting the use of unauthorized extensions.
- c. Effective December 16, 1976 all welds that require the use of weld extensions shall be identified and approved by the lead weld engineer.

353/ 76-06
ATT I/2

Attachment II

Response to Item B of Appendix A

Deficiency

10CFR50, Appendix B, Criterion X requires in part, "A program that inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions . . . shall be performed for each work operation where necessary to assure quality".

Contrary to the above, the inspection of activities during October 1976 did not verify conformance with Specification A-26, Revision 2 requirements for protection of machined surfaces during sandblasting and painting operations on the containment dome, and such protection was not maintained and the machined surfaces were inadvertently painted and possibly sandblasted.

Response

1. Corrective steps which have been taken and results achieved:
 - a. The deficiency was documented by Bechtel NCR #1981 dated October 22, 1976.
 - b. The exposed surfaces of both the Unit #1 and Unit #2 drywell heads were inspected by Bechtel Quality Control with the following findings:
 1. No evidence of surface damage due to sandblasting or rust.
 2. Portions of both surfaces show evidence of dry overspray of Amercoat 90.
 - c. As coating of both drywell heads is complete, they will be placed into project storage maintenance program.
2. Corrective steps taken to avoid further items of noncompliance:

A periodic inspection of the machined surfaces of the drywell heads has been incorporated into the project's storage maintenance program. The action card was entered

353/76-06
ATT II/1

into this program on December 1, 1976. Inspection at three-month intervals is scheduled.

A procedure for application of a new rust preventive material will be incorporated into the program by December 22, 1976. Due to a minimum temperature requirement of 50°F for application, removal of the present preservative and overspray will not be completed until June 1, 1977. Over this six month period, storage of the drywell heads in their present state will not jeopardize the quality of the machined surfaces.

353/76-06
ATT II/2

Attachment III

Response to Item C of Appendix A

Deficiency

10CFR50, Appendix B, Criterion V requires in part, "Activities affecting quality shall be prescribed by documented instructions and shall be accomplished in accordance with these instructions."

Contrary to the above, on October 20, 1976 the document control requirements of job rule JR-G-5 were not implemented for design decisions to place holes in the upper flange of structural steel beams at elevation 253 of Area 18 of the reactor building.

Response

1. Corrective steps which have been taken and results achieved:

- a. DCN No. 2 to Revision 10 of drawing 8031-C-200 issued October 26, 1976 authorizes the drilling of holes in the top flange of beams at Elevation 253'-0" in the Reactor Building in order to support temporary beams.
- b. DCN No. 2 to Revision 13 of drawing 8031-C-193 issued November 24, 1976 authorizes, on a generic basis in the Reactor Building and Control Room Area, the drilling of holes in the top flange of beams and girder in order to support temporary beams.
- c. Project Quality Control Instruction 8031/C-2.10, Revision 4 has incorporated a task to inspect for the removal of temporary beams, if installed, and that the permanent beams were not damaged.
- d. This activity was approved by Project Engineering via a telephone discussion with the Resident Engineer, and a telecon memorandum was prepared on February 6. However, contrary to project procedures, no FCR was issued or change to the applicable design document made as required for modification of a Q-listed component.

A review has been made of construction actions which resulted from telephone conversations (telecons) between the Resident Engineer and Project Engineering, and the Resident Engineer Memoranda. Where necessary, FCRs have been initiated to revise the design documents.

353/76-06
ATT III/1

2. Corrective steps taken to avoid further items of noncompliance

- a. Engineering Internal Instruction, EII-31, issued November 11, 1976, requires a documented review of Resident Engineer Memoranda by Project Engineering to ensure that any necessary DCN's/FCR's are identified and issued.