



APPL. Ex. 103

REF: 57

MAR - 2 1979

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

Subject: USNRC IE; I Letter dated January 31, 1979  
RE: Site Inspection of December 26-29, 1978 and  
January 2, 1979  
Inspection Report No. 50-352/78-12 & 50-352/78-03  
Limerick Generating Station - Units 1 & 2  
File: QUAL 1-2-2 (352/78-12 and 353/78-08)

Dear Mr. Grier:

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

Attachment I - Response to Appendix A

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

Sincerely,

*V. S. Boyer*  
V. S. Boyer

RJL/gta  
Attachment

cc: R. H. Elias, Bachtel  
J. S. Kampar  
E. J. Bradley  
C. White  
E. C. Kistner  
H. R. Walters/Local File (1)  
J. J. Clarey  
R. A. Mulford  
J. M. Corsoran  
Project File (1)

E. R. Klossin, Bachtel

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PDR ADOCK 05000352  
PDR

## ATTACHMENT I

### RESPONSE TO APPENDIX A

#### Item of Noncompliance

10 CFR 50, Appendix B, Criterion V, states, in part, that: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings ... and shall be accomplished in accordance with these instructions, procedures, or drawings."

The Limerick PSAR, Appendix D, Quality Assurance Program, Paragraph D.6.4, states, in part, that: "(Bechtel) quality control engineers... are responsible for preparing inspection plans in accordance with the Field Inspection Manual, (and) Performing Quality Control Inspections." Bechtel Project Special Provisions Procedure G-6.1 states in Section 3.1.5 that "an Inspection Point (I) in the Quality Control Instruction (QCI) is a mandatory inspection point beyond which work shall not proceed past the point where the designated activity is no longer inspectable".

Contrary to the above, on December 2, 1978, the welding of a two inch nipple onto pipe spool piece FSK-EBB-129-3/9 had proceeded beyond the point where some of the designated mandatory inspections could not be performed.

#### Response to Item of Noncompliance

The required inspections have been performed and documented. A review of other open inspection plans indicates that no other Quality Control hold points have been bypassed. In any event, if hold points are missed they are identified prior to the start of final inspections as a matter of routine, since in-process inspections are reviewed for completeness prior to the start of final inspections. In order to avoid further items of noncompliance, the Field Staff Engineering and Area Supervision were re-instructed at a meeting on January 2, 1979, on their quality related responsibilities concerning hold points.

#### Discussion

It is requested that this item of noncompliance be reclassified as an unresolved item since the Quality Control Instructions on the Limerick project are designed to identify missed inspections or hold points. We do not consider it appropriate to identify this as an item of noncompliance since reviews of the in-process inspections and final inspections which follow would have identified the condition.

I-1/1  
50-352/78-12  
50-353/78-08