

REF: 75

JAN 20 1981

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

Subject: USNRC IN Region I Letter dated December 17, 1980  
RE: Site Inspection of November 2-28, 1980  
Inspection Report No. 50-352/80-20 and 50-353/80-18  
Limerick Generating Station - Units 1 and 2  
  
File: QUAL 1-2-2 (352/80-20 and 353/80-18)

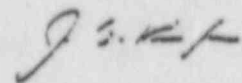
Dear Mr. Grier:

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

Attachment I - Response to Appendix A

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

Sincerely,



JJK/nak  
Attachment

cc: R. H. Elias, Bechtel  
E. R. Klossin, Bechtel  
E. J. Bradley  
G. White  
E. C. Kistner  
H. R. Walters/Local File (2)  
J. J. Clarey  
R. A. Melford  
J. M. Corcoran  
Project File (2)  
J. P. Durr, Resident NRC Inspector

ATTACHMENT I  
RESPONSE TO APPENDIX A

Item of Noncompliance - A

Infraction

10CFR50, Appendix B, Criterion IX, states, in part: "...welding... (is) controlled and accomplished... in accordance with applicable codes, standards, specifications...".

The Limerick PSAR, Appendix D, Quality Assurance Program, paragraph D.6.4 states, in part, that: "Bechtel Construction Department... is responsible for construction of the plant to approved engineering specifications, drawings and procedures...".

General Electric Specification 22A2284, Revision 2, "Field Erection of Reactor Recirculation Piping", paragraph 4.7.1. Piping Butt Joint End Preparation, requires that, "...existing piping butt joint end preparation shall not be remachined, filed, ground or otherwise changed without prior approval of General Electric."

Contrary to the foregoing, on November 6, 1980 reactor recirculation pipe spool RS-N-A2, pipe weld preparation BWRPD-1REC-1/4 WA3, was ground approximately 3/16" into the base metal and approximately 49" around the circumference. There was no apparent authorization from General Electric to do this alteration.

Response

The item of noncompliance was documented on Bechtel Nonconformance Report 4408. General Electric disposition and authorization for reworking the weld preparation was obtained on GE Field Deviation Disposition Request NHI-424. Additionally, a training session for Engineering, Supervision, Quality Control and Craft personnel was held on November 7, 1980 in which the specification requirements were explained and emphasized. Full compliance was achieved on November 17, 1980.

Item of Noncompliance - 3

Infraction

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Appendix B, of 10CFR50, Criterion V, states in part: "Activities affecting quality...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 Construction Department... is responsible for construction of the plant to approved engineering specifications, drawings and procedures..."

Limerick Project Standard for Visual Examination Acceptance Criteria for Welded structures, 8031-G-20, paragraph 4.1.6.1 states, in part, "...undercut not exceeding 1/32" may be accepted..."

Contrary to the foregoing, on November 14, 1980, 10 areas of undercut exceeding 1/32" in depth were observed on the feedwater pipe restraint depicted on drawing C-836, Revision 5.

Response

The subject feedwater pipe restraint was inspected by Bechtel Power Corporation inspectors subsequent to the NRC identification of the deficiencies. Additional deficiencies identified were recorded on a Bechtel Power Corporation Nonconformance Report for engineering evaluation. As a result of this inspection, further inspections are required in order to perform an engineering evaluation of the conditions. The additional inspections and engineering evaluation will be completed by May 1981 and rework, if required, will be completed by July 1, 1981.

To prevent recurrence, the manufacturer sent a representative to the site to observe the conditions first hand. In addition to this, a Philadelphia Electric Company audit of the vendor involved to check on the effectiveness of his welding inspection program will be conducted during the 3rd week of January 1981.