

PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION

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January 31, 1992

GRAHAM M. LEITCH
VICE PRESIDENT
LIMERICK GENERATING STATION

Docket Nos. 50-352
50-353
License Nos. NPF-39
NPF-85

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: Limerick Generating Station, Units 1 and 2
Reply to a Notice of Violation
NRC Inspection Report Nos. 50-352/91-23
and 50-353/91-24

Attached is Philadelphia Electric Company's reply to a Notice of Violation for Limerick Generating Station (LGS) Units 1 and 2, which was contained in the NRC Inspection Report Nos. 50-352/91-23 and 50-353/91-24 dated January 2, 1992.

The Notice of Violation involves use of a non-evaluated vendor to machine bend test samples for qualification of welders by the Barbadoes Training Facility without making provisions for source or receipt inspection.

The attachment to this letter provides a restatement of the violation identified during an NRC inspection conducted between October 29, 1991, through November 4, 1991, at LGS, Barbadoes Training Center, and Chesterbrook Nuclear Maintenance Division, followed by our response.

If you have any questions or require additional information, please contact us.

Very truly yours,



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JLP:cah

Attachment

cc: T. T. Martin, Administrator, Region I, USNRC
T. J. Kenny, USNRC Senior Resident Inspector, LGS

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Reply to a Notice of Violation

Restatement of the Violation

During an NRC inspection conducted on October 29, through November 4, 1991, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10CFR Part 2, Appendix C (1991), the violation is listed below:

10CFR50, Appendix B, Criterion VII, requires that a licensee provide for vendor evaluation and selection, objective evidence of quality of goods and services, source inspection, and examination at delivery.

Chapter 17.2.7.1 of the Updated Final Safety Analyses Report states that vendors will be evaluated and approved by the Nuclear Quality Assurance Department.

Contrary to the above, a non-evaluated vendor was used to machine bend test samples for qualification of welders by Barbadoes Training Facility without making provisions for source or receipt inspection.

This is a Severity Level IV Violation (Supplement I).

RESPONSE

Admission of Violation

Philadelphia Electric Company (PECo) acknowledges the violation.

Reason for the Violation

Prior to your inspection PECo recognized applicability of 10CFR50, Appendix B, Criterion IX, and the Nuclear Quality Assurance (NQA) plan, Criterion 9, to qualification of welders. PECo did not realize that 10CFR50 Appendix B, Criterion VII, applied to a vendor used to prepare test samples for weld certification testing.

Corrective Action and Results Achieved

Use of the non-evaluated vendor to prepare test samples was eliminated on November 14, 1991, after ensuring that no test samples were at the vendor. A review was performed to ensure that all vendor services used in the welding qualification program are on the Evaluated Vendor List (EVL). All test sample preparation formerly performed by the non-evaluated vendor was assumed by the Barbadoes Training Center in compliance with the NQA plan effective November 14, 1991.

Corrective Actions Taken to Avoid Future Non-Compliance

PECo will perform test sample preparation in-house in accordance with the NQA plan and Section IX of the ASME code. In the future, the use of a vendor for test sample preparation in the welding qualification program will comply with 10CFR50, Appendix B, Criterion VII and Criterion 7 of the NQA plan. Prior to use of a vendor on the EVL to prepare test samples, procedures would be developed for Barbadoes Training Center personnel to perform receipt inspection on the test samples.

Date When Full Compliance was Achieved

Full compliance was achieved on November 14, 1991, when use of the non-evaluated vendor was eliminated and test sample preparation was assumed by the Barbadoes Training Center.