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PHILADELPHIA ELECTRIC COMPANY

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January 7, 1985

Docket No. 50-352

SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Dear Mr. Martin:

Your letter of December 10, 1984, forwarded the results of Inspection No. 50-352/84-57 which cited an activity at our Limerick Generating Station which did not appear to be in full compliance with NRC requirements. This apparent violation is restated below followed by our response.

Finding

10 CFR 50, Appendix B, states in Criterion V, "Activities affecting quality shall be prescribed by documented instructions, procedures or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings. Instructions, procedures or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished". Limerick Generating Station Quality Assurance Plan is written to comply with 10 CFR 50, Appendix B, and reiterates, in Section 5.1, the requirements of Criterion V and specifies that they be implemented.

Contrary to the above, at sometime between March 22, 1984 and October 10, 1984, an activity involving the removal and re-installation of bolts or nuts for access doors to ducts and plenum of the safety related Control Room Emergency Ventilation System, was performed without procedures appropriate to the circumstance. As a result of this activity, the system was not properly restored as evidenced by the following access doors which were found on October 10, 1984 to have missing or loose bolts and/or nuts:

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<u>Access Door Location</u>	<u>Bolts or nuts missing or loose</u>
Between HV-020B and HV-020D	4 of 8
Between PD-C 013A and HV-010A	3 of 8
Between HV-010B and PD-C 013B	1 of 8
Between HV-020C and HV-020A	1 of 8
Upstream of heaters for OBE-192	1 of 4

This is a Severity Level IV violation, (Supplement II)

RESPONSE

This violation was the result of the failure to completely implement existing procedures. Startup Administrative Procedures AD6.4 "Startup Work Order" (SWO) and AD6.11 "Startup Work Authorization" (SWA) require that the scope of work be properly described and Quality Control (QC) "Hold Points" and "Witness Points" be established.

In this case, it appears that work on the Heating, Ventilating and Air Conditioning (HVAC) isolation valve actuators required the removal of the access doors. The SWO's/SWA's for performing this work did not clearly indicate that the access doors were to be removed. As a result of this oversight, the reinstallation of access doors was not properly identified as requiring QC inspection.

The missing nuts and bolts referenced above were replaced and closures were inspected to verify correct installation. An inspection of various elevations and areas throughout the reactor building and the control enclosure was performed to determine if a generic problem existed or if this was an isolated occurrence. This inspection, which covered approximately 80% of the G-listed ducts containing access doors, revealed one missing nut and one broken stud not previously identified. To prevent recurrence the Engineering & Research Quality Assurance Field Branch Head issued a Notice to the applicable groups performing work at LGS to re-enforce QA Program requirements. Shortly after this problem was identified by the E&R, responsibility for these systems was transferred to the Plant Staff from the Startup organization.

Consequently, work that had been controlled by the Startup Administrative Manual and procedures is now being controlled by the Plant Administrative Procedures. In addition, Electric Production QC has established a program of routine monitoring of housekeeping through the use of Quality Control Instructions (QCI) that include LGS-QCI-008 which requires the verification that closures are properly installed and any loose or missing parts are identified. This monitoring is presently performed three times a week.

Should you have any questions or require further information, please contact us.

Very truly yours,

Original signed by

B. L. DALTROFF

cc: Dr. T. E. Murley, Administrator
Mr. J. T. Wiggins, Senior Resident Inspector
See Service List

cc: Judge Helen F. Hoyt
Judge Jerry Harbour
Judge Richard F. Cole
Judge Christine N. Kohl
Judge Gary J. Edles
Judge Reginald L. Gotchy
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