

PHILADELPHIA ELECTRIC COMPANY

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V. S. BOYER
VICE-PRESIDENT

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 Region I Letter dated August 28, 1979
RE: Site and Office Inspection of June 18-20, 1979
Inspection Report No. 50-352/79-06 & 353/79-06
Limerick Generating Station - Units 1 & 2

File: QUAL 1-2-2 (352/79-06 and 353/79-06)

Dear Mr. Grier:

In response to the subject letter regarding items identified during the subject inspection of construction activities authorized by NRC License Nos. CPR-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,

V. S. Boyer
V. S. Boyer

JMC/mmk
Attachment

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ATTACHMENT I

RESPONSE TO APPENDIX A

Item of Noncompliance

Infraction

Appendix B of 10CFR50, Criterion V, states, in part: "Activities affecting quality ----- shall be accomplished in accordance with these instructions, drawings and procedures -----."

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

Bechtel Piping System Erection Specification P-322, Revision 1, Paragraph 8.2.1, states, in part: "Prior to erection of a system, field engineering shall provide data for project engineering review and approval indicating:

- (a) The proposed spool erection sequence.
- (b) The proposed final closure fit-up points."

Contrary to the above as of June 19, 1979, pipe spools for RHR piping (DCA-104-01) were installed (erected and welded) without the required proposed spool erection sequence and final closure fit-up points having been submitted to Bechtel Project Engineering for review and approval.

Response to Infraction

The pipe spool erection sequence was submitted to Bechtel Project Engineering and approval has been received. This approval covers the actual sequence in which the spools were installed and covers all welds made to date.

In order to avoid further items of noncompliance a review was made of piping systems requiring approved erection sequences and the procedures containing these sequences have been submitted to Bechtel Project Engineering and have been approved. The approval covers the actual sequence in which the spools were installed and covers all welds made to date. A training session covering the above subject was held for the responsible Superintendents, Engineers and General Foremen.

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