

PHILADELPHIA ELECTRIC COMPANY

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V. S. BOYER  
VICE-PRESIDENT

November 22, 1978

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 October 24, 1978  
Re: Investigation Report 50-352/78-08  
Limerick Generating Station, Units No. 1 and 2  
File: QUAL 1-1-2 (358/78-08)

Dear Mr. Grier:

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

Attachment 1 - Response to Appendix A "Notice of Violation"

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

Sincerely,

  
V. S. Boyer

WJA:jem  
Attachment

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## Attachment I

### Response to Item of Noncompliance

#### Violation

Criterion IX, requires in part that, welding be accomplished in accordance with applicable criteria and other special requirements.

The Quality Assurance Program implementation described in the Limerick Generating Station PSAR Appendix D, requires in Paragraph D.6.3, that the Bechtel Procurement Department is responsible for inspections of procured items to assure compliance with the specification requirements.

Harnischfeger (P&H) drawing No. 28A13615, Sheet 1, Revision C, of the Reactor Building Crane, view BB and Detail "A" specifies that the weld joint between the tie-plates (Part No. 18) and the box girder be a 45° double-bevel-groove weld with a 3/8" prepared chamfer on each side.

Contrary to the above, it was determined that the reactor building crane tie-plate-to-box-girder-welds were fillet welds.

#### Response

- 1) An inspection performed on 100% of the exterior welds by P&H, assisted by Bechtel Q.C. and Bechtel Field Welding, confirmed that the above noted welding deficiency was an isolated case.
- 2) P&H has reported that their calculations show that the weld fillet size must be increased to 9/16 inch fillet welds on both sides of plate No. 18. These fillet welds have been repaired using Bechtel welding procedure PI-A-LH structural. The completed inspection of these welds confirm that they meet the 9/16 inch dimensional requirement.

Drawings are presently being revised by P&H to reflect the as-built conditions.

- 3) To prevent recurrence, the site Project Quality Control Instructions for receiving inspection (QCI-R-1.00) is currently being revised to include a supplement for use when inspection of AWS welding is involved. This supplement will be available for use on November 22, 1978.
- 4) Additionally, an inspection was made of some of the welded stiffeners within the box girder of the crane. An evaluation of the results of this inspection is underway.

We anticipate that this evaluation will be completed shortly, and that any necessary repairs will be completed by April of 1979.