

PHILADELPHIA ELECTRIC COMPANY

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FEB 14 1980

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 January 11, 1980  
RE: Site and Office Inspection of October 15 thru November 15, 1979  
Inspection Report No. 50-352/79-11 and 50-353/10  
Limerick Generating Station - Units 1 & 2  
File: QUAL 1-2-2 (352/79-11 and 353/79-10)

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Dear Mr. Grier:

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

*J. S. Kemper* VAS

J. S. Kemper  
Vice President  
Engineering & Research Dept.

JMC/mmk  
Attachment

8004230071

Attachment J  
Response to Appendix A

Item of Noncompliance - A

Appendix B, of 10 CFR 50, 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..."

Bechtel Power Corporation Job Rule G-7 Revision , states in Section 2.2, "in-place" is the location of equipment placed in the plant...because of surrounding construction work, it is during this period that the equipment is often least protected from dust, dirt and moisture. Temporary coverings, heating facilities and routine inspection shall be employed as specified on the maintenance action card. Careful planning and surveillance is required to ensure the equipment is adequately protected."

Contrary to the above, as of October 24, 1979 one end of the 4KV switchgear no. 10A117 was not adequately protected from adjacent construction activities. There was raceway material, cable reels, empty soda cans and cement dust either next to or on the switchgear. The scheduled surveillance activity for visual inspection was once per year which is inadequate to ensure protection with the amount of construction activity present in the area.

Response to Item of Noncompliance - A

The subject switchgear was protected by plywood and polyethylene while other adjacent construction activities continued. All equipment was rechecked after this occurrence and found to be acceptable. Subsequently all switchgear was cleaned to remove dust and dirt upon completion of adjacent blockwork and fireproofing and then recovered with polyethylene.

The contractor's Superintendents have been instructed to keep all equipment covered and protected from damage and dirt.

Item of Noncompliance - B

Appendix B, of 10 CFR 50, 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..."

The heating, air conditioning and ventilation subcontractor's weld procedure SSM-502, Revision 3, states..."the welding current and manner of depositing the weld metal shall be such that there will be practically no undercutting into the base metal."

Contrary to the above, as of November 1, 1979 excessive undercutting into the base metal resulted from the manner in which the welder deposited weld for the damper flange joint (FPD-202-47). The undercut exceeded 1/32 inch.

Response to Item of Noncompliance - B

The noncompliance was resolved by a design change which provides an alternate installation detail to be utilized when spacial limitations preclude performing a satisfactory external perimeter weld. The alternate installation allows welding the damper to the penetration on the internal surface in those areas where the external weld is impractical.

Previously existing installations will be inspected by August 31, 1980, and reworked if necessary.

Should a similar damper positioning condition reoccur the alternate installation detail allowing the structural and seal weld in the internal surface will be utilized.