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JUN 23 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 May 26, 1980
RE: Site and Office Inspection of February
25 - March 25, 1980
Inspection Report No. 50-352/80-03 & 50-353/80-03
Limerick Generating Station - Units 1 and 2

File: QUAL 1-2-2 (352/80-03 and 353/80-03)

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
J. S. Kemper

JMC/mmk
Attachment

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ATTACHMENT I

Item of Noncompliance

Deficiency

Appendix B, of 10CFR50, 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 welding standard "GWS-Structural" Revision 2, states in Section 5.1 that the minimum preheat temperature of 70°F for a weld joint thickness range of 3/4" - 1 1/2" shall be maintained during all welding.

Contrary to the above, on March 3, 1980 a welder was about to weld on pipe restraint (PR-239) without preheating the weld joint. The temperature in the working area was in the low sixties. This item is a deficiency.

Response to Deficiency

On March 4, 1980, PECO - QA issued a stop work order on pipe restraint PR-239 and all other welding under the direction of the foreman responsible for the work on restraint PR-239. The welder was re-instructed on where the preheat requirements can be found on the weld authorization papers. Additionally, on March 6, 1980 foremen were given a refresher class on general welding requirements, including preheat requirements. Several contact pyrometers are available to both welders and foremen. A release of the stop work was issued on March 6, 1980 upon completion of the above corrective steps to avoid further items of noncompliance.

A review of the welding on PR-239 concluded that the weld is acceptable as welded, because the base metal temperature was above the 50°F minimum preheat requirement imposed by more recent editions of the AWS code. Final weld NDE confirmed weld acceptability.

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