

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4502

JUL 17 1980

JOHN S. KEMPER  
VICE-PRESIDENT  
ENGINEERING AND RESEARCH

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 June 19, 1980  
RE: Site and Office Inspection of March 26-April 30, 1980  
Inspection Report No. 50-352/80-05 and 50-353/80-05  
Limerick Generating Station - Units 1 and 2  
File: QUAL 1-2-2 (352/80-05 and 353/80-05)

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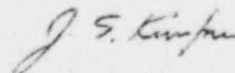
Dear Mr. Grier:

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

JMC/mmk

Attachment

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## ATTACHMENT I

### Response to Appendix A

#### Item of Non Compliance

##### Infraction

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's welding procedure GWS-(structural) Section 4.4.2.2 states in part .... that the repair cavity shall be reasonably smooth, free from excessive notches or harmful irregularities which could trap slag or cause lack of fusion.

Contrary to the above, on April 29, 1980, welding had commenced on a repair area of pipe restraint No. 215 where the prepared cavity had areas which were very narrow (notch-like) and irregular; which could trap slag or cause lack of fusion.

##### Response to Infraction

As stated in NRC - IE Inspection Report 50-352/80-05 and 50-353/80-05 paragraph 10.a, immediate corrective action was taken. PECO QA issued a stop work order and investigated the cause of the infraction.

The investigation revealed that during the preparation of the weld bevel on pipe restraint #215, grinding operations uncovered several areas of slag and porosity. In-process rework notice #W450 was issued and the rework notice instructed field personnel to grind as necessary to remove enough slag to allow an adequate seal weld, and then proceed with design welding. This disposition on the rework notice failed to consider the effect of weld joint configuration on rework grinding and that the rework grinding would naturally result in the removal of base material required for the design weld. Rework Notice #W450 should have required a weld repair and not a seal weld in the base material.

The welder and foreman were interviewed and both were familiar with the requirements for preparing a weld repair cavity. The infraction occurred because they attempted to follow the instructions on the Rework Notice.

An interview with Field Engineer who prepared Rework Notice #W450 determined that he did not consider the possibility of over-grinding into the base material due to weld joint configuration. The Field Engineer was instructed on April 30, 1980 that on future Rework Notices, the instructions should be more explicit when complex joint configurations are to be reworked.

A second Rework Notice (#W456) was issued on April 30, 1980 to properly instruct the welder to perform the rework and repairs on this weld joint. PECO QA released the stop work order upon the completion of the interviews and issuance of Rework Notice #W456. The repair was completed on April 30, 1980.