



PHILADELPHIA ELECTRIC COMPANY

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MAY 26 1981

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 Letter dated April 30, 1981
RE: Site Inspection of March 2-27, 1981
Inspection Report No. 50-352/81-04 & 50-353/81-04
Limerick Generating Station - Units 1 and 2

File: QUAL 1-2-2 (352/81-04 & 353/81-04)

Dear Mr. Grier:

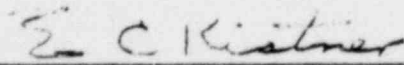
In response to the subject letter regarding items identified during the subject inspection of construction activities authorized by NRC License Nos. CPPR-106 and -107, we transmit herewith the following:

Attachment I - Response to Appendix A

Also enclosed as required by the Notice of Violation, is an affidavit relating to the response.

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

Sincerely,


Chief Mechanical Engineer
for J. S. Kemper

JPE/gra
Attachment

Copy to: Director of Inspection and Enforcement
United States Nuclear Regulatory Commission
Washington, D.C. 20555

J. P. Durr, USNRC Resident Inspector

810 6090 543

COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF PHILADELPHIA : s.

EDWARD C. KISTNER, being first duly sworn, deposes
and says:

That he is Chief Mechanical Engineer of Philadelphia
Electric Company, the holder of Construction Permits CPPR-106 and
CPPR-107 for Limerick Generating Station Units 1 and 2; that
he has read the foregoing Response to Inspection Report
Nos. 50-352/81-04 and 50-353/81-04 and knows the contents thereof;
and that the statements and matters set forth therein are true
and correct to the best of his knowledge, information and belief.

E C Kistner

Subscribed and sworn to
before me this 26th day
of May, 1981

Joseph H. Boyer
Notary Public
Philadelphia, Pa.
My Commission Expires Jan. 30, 1982

ATTACHMENT I
RESPONSE TO APPENDIX A

Violation - A

10CFR 50, Appendix B, Criterion V, states, in part, that, "Activities affecting quality shall be ... accomplished in accordance with these instructions, procedures, or drawings."

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

General Electric Specification 22A2724, Revision 2, Equipment Storage Requirements, Paragraph 4.1.2.1.2.a., states, in part, "Internal cleanliness of equipment...shall be maintained by closing openings, where possible, by plugging, capping and/or sealing with tape."

Contrary to the above, on March 16, 1981, reactor coolant pressure boundary valves 1F023B, 1F031A, 1F031B and 2F023B were observed to have openings to internal parts exposed. (353/77-10-01)

This is a Severity Level VI Violation (Supplement II) applicable to CPPR-106 and CPPR-107.

Response to Violation

The valves noted in the violation to be totally or partially uncovered were inspected and no detrimental affects were found. These valves have now been properly covered.

To prevent recurrence, the appropriate construction personnel were reminded to properly restore covering materials after working on or around valves, and the responsible quality control personnel were reinstructed in the requirements to assure proper storage of equipment during installation.

Violation - B

10CFR 50, Appendix B, Criterion V, states in part: "Activities affecting quality shall be ... accomplished in accordance with these instructions, procedures, or drawings."

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

Job Rule JR-G-28, Revision 19, "Job Rule for Installation of Expansion Anchors and Grouted-In Threaded Rods," Paragraph 5.2, states in part: "Each area (rebar cutting) drill shall be kept out of general circulation and shall be used only with the approval of the Lead Area Engineer." Further, Job Rule JR-G-28, Revision 19, Paragraph 5.5, states in part: "When rebar is cut in a Q-listed area, a copy of the (cut Reinforcing Steel Report) form is given, on the same day, to QC to verify the hole locations."

Contrary to the above, from November 12, 1980 to January 1, 1981, forty-three core drills (rebar cutting drills) were in general circulation; in that they were issued, logged out, and never returned. Also, on or about February 10-13, 1981, reinforcing steel was cut while drilling anchor bolt holes for a pipe support on the KBF-101, pipe, elevation 313', area 15. Reactor Building No. 1, and the cut Reinforcing Steel Report was not issued until February 25, 1981. (352/81-04-01)

This is a Severity Level V Violation (Supplement II) applicable to CPPR-106.

Response to Violation

A recall of the rebar cutting drills was issued immediately upon discovery of this condition. Any bits that were not accounted for during the recall were presumed worn-out and subsequently discarded.

Since this item of noncompliance occurred, we have taken several steps to prevent recurrence of this condition. These actions include the revision of Job Rule G-28 to more clearly describe the use and control of the rebar cutting bits. In addition, the procedure has been changed to revise the controls of the following activities; excavation review prior to drilling, the actual drilling, rebar cutting approval, documentation of cut rebar, and installation. The above changes are now implemented and their effectiveness is under evaluation. Further changes may be needed as a result of our evaluation of these procedural changes.

We are also currently evaluating the impact of not fully controlling the rebar cutting bits and from not reporting cut rebar in a timely manner.

We are unable to complete our evaluation and develop conclusions on the effectiveness of the above actions at this time. A final response to this violation will be submitted by 9/15/81.