

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company
Philadelphia, Pennsylvania 19101
License Nos. CPPR-106
CPPR-107

Docket Nos. 50-352
50-353

As a result of the inspection conducted on March 2-27, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. 10 CFR 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.

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

- B. 10 CFR 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.

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

Pursuant to the provisions of 10 CFR 2.201, Philadelphia Electric Company is hereby required to submit to this office within twenty-five days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Dated APR 30 1981


Richard R. Keimig, Chief, Projects
Branch #2, Division of Resident and
Project Inspection