

APPENDIX A
NOTICE OF VIOLATION

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

Docket Nos. 50-352
 50-343

As a result of the inspection conducted on April 1-30, 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 XVI, states, in part, that: "Measures shall be established to assure that conditions adverse to quality...are promptly identified and corrected."

The Limerick PSAR, paragraph D.4.12, states, in part: "The program shall provide input for the initiation of corrective action and followup as appropriate."

The Limerick Quality Assurance Plan, Volume 1, Appendix S, "Procedure for Processing Field Initiated Finding Reports", paragraph S-5.1.7, states: "The Responsible Organization shall take or have corrective action taken...".

Contrary to the above, welding inadequacies were not properly corrected, in that Field Finding Report N-173, issued on November 1, 1979 for corrective action on an NRC finding which resulted in the January 11, 1980 forwarding of a citation for noncompliance with fire damper welding requirements, was improperly closed out by the architect-engineer and that closure was accepted by the licensee on February 6, 1980. Closure was based on contractor rework of fire damper installations to assure compliance with the approved Field Change Request FCR-C6351 requirement for alternate, interim welding of fire damper exterior welds which do not meet accessibility requirements and upon future fire damper installation in accordance with FCRC6351 or an alternate acceptable method. NRC inspection in April 1981 disclosed that fire protection dampers FPD-202-3, FPD-201-31, and FPD-202-44 had exterior welds without sufficient access for inspection.

This is a Severity Level IV Violation (Supplement II.D.1) applicable to CPPR-106.

- B. 10 CFR 50, Appendix B, Criterion V, requires 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..."

Bechtel specification 8031-C-41A, paragraph 4.4, states in part: "All welding shall be in accordance with the "Structural Welding Code," AWS D1.1..."

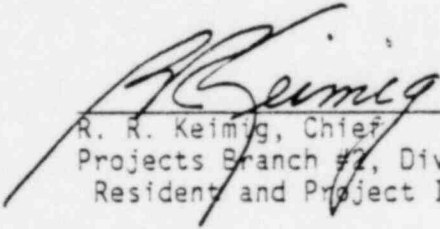
The "Structural Welding Code", AWS D1.1, requires in paragraph 3.6.4: "For buildings...undercut shall not be more than 0.01 inches deep when its direction is transverse to primary tensile stress in the part that is undercut, nor more than 1/32 inches for all other situations.

Contrary to the above, on April 22, 1981, welding undercut in excess of 1/32 inches was observed on the North Reactor Building Exhaust Stack in welds on beam members 22D2 and 24D4R.

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

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 steps which will be taken to avoid further violations; and 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.

Date JUN 01 1981



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