

U. S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 63-07, 83-04

Docket No. 50-352, 50-353

License No. CPPR-106, CPPR-107 Priority - Category A

Licensee: Philadelphia Electric Company

2301 Market Street

Philadelphia, Pa. 19101

Facility Name: Limerick Generating Station, Units 1 & 2

Inspection At: Limerick, Pa.

Inspection Conducted: April 24 - May 28, 1983

Inspectors: S. K. Chaudhary
S. K. Chaudhary, Senior Resident Inspector

6/1/83
date

Jane M. Grant
Jane M. Grant, Reactor Engineer, DPRP

6-1-83
date

date

Approved by: E. L. Conner, Jr.
E. L. Conner, Jr., Chief, Reactor Projects
Section, 2 D

6/2/83
date

Inspection Summary: Combined Inspection Report for Inspection Conducted
April 24 - May 28, 1983 (Report Nos. 50-352/83-07; 50-352/83-04)

Areas Inspected: Routine inspection by resident inspector and one region-based reactor engineer of: (1) CRD supports; (2) follow-up of 10CFR21 reports; (3) design change control; (4) personnel training; and (5) review of licensee's preoperational test program. The inspection involved 80 hours by the resident inspector and 52 hours by the reactor engineer on Unit 1 and 15 hours by the resident inspector on Unit 2. No violations were identified.

8306150247 830602
PDR ADOCK 05000352
G PDR

DETAILS

1. Persons Contacted

PECO

- *D.T. Clohecy, QA Engineer
- *J. M. Corcoran, Field QA Branch Head
- *F. J. Coyle, QA Engineer
- *E. C. Gibson, QA Engineer
- *P. K. Pavlides, Manager, QA

Bechtel Power Corporation

- *G. Kelly, Lead Site QA Engineer
- *K. Stout, Project QC Engineer

In addition to the above, other managers, supervisors, engineers, technicians and craftsmen were contacted and interviewed throughout this inspection period as the inspector interfaced with their work.

2. Status of Previously Identified Open Items

(Open) Violation 82-13-01 in the area of design control by failing to incorporate Field Change Requests (FCR's) in the drawing within the time required by project procedures. The licensee has initiated additional actions to improve the timeliness of incorporation of changes into affected drawings, and expects it to be complete by the end of May 1983. The item remains open until the completion of corrective action and verification by NRC.

3. Plant Tour and Walk-through Inspections

Periodically during the inspection, the inspector made plant tours of both units and common facilities. During the tour the inspector examined completed work, work-in-progress, quality control activities, equipment storage and handling, and maintenance. He discussed the technical and procedural aspects of work with craftsmen, supervisors, and engineers to assure that work was being performed in accordance with project technical and procedural requirements. Some specific activities observed during these inspections included cable pulling, CRD supports, equipment handling and installations. The examination of these activities covered both units, but special emphasis was placed on work in Unit No. 1.

No violations were identified.

4. Control Rod Drive Support Design by Teledyne

The inspector reviewed documentation and held discussions with the licensee, A-E, and Teledyne engineers to assess the effectiveness of design control, and conformance of the completed support to the approved drawings and design. The inspector examined the CRD support at elevation 272' located at 14'6 3/8" south of column line G for a comparison with the approved drawings. The following drawings were reviewed:

- Teledyne drawing E-5987, Revision 3
- Teledyne drawing E-5917, detail 9

Based on the above examination, document review, and discussions with cognizant personnel, the inspector determined that the support was erected per the approved design, and the design change control measures established by Teledyne were effective in preventing any inadvertent and/or unauthorized change in design.

No violations were identified.

5. 10CFR21 Report by Tube-Line Corporation

The Stainless Steel Division of Tube-Line Corporation filed two Part 21 reports. The first was dated April 25, 1983 and was related to stainless steel pipe flanges supplied by them for nuclear applications. The problem was that the flanges were not heat treated in accordance with all the requirements of the ASME code.

The inspector followed-up the deficiency and determined that the licensee has received one 8" flange from Tube-Line Corporation for safety-related application. The constructor has identified the flange and a nonconformance report has been issued to evaluate and disposition this deficiency. This matter is unresolved pending evaluation of the problem and appropriate resolution. (352/83-07-01)

The second report was submitted on May 6, 1983. This problem related to a deficiency in plate welding with filler metal that did not meet all the manufacturing requirements of the ASME code. The licensee is continuing the investigation to determine the application and location of these items and to evaluate the extent of this problem. The licensee's actions will be followed-up in routine resident inspections.

6. Follow-Up on Radiation Monitors from GA Technology

On May 12, 1983, the licensee received four radiation monitors from GA Technology containing Cs136 and Ba133 as sources. Initially, from the supplier's documentation, it appeared that the sources exceeded the exempt quantities (10CFR30.71, Schedule B) for these materials. However, an investigation by the licensee QA and on-site health physics group revealed that the sources contained materials within exempt limits. The Chlorine and Barium sources had 0.05 microcurie and 10 microcurie activity respectively. Two monitors did not show any detectable levels of radiation on

the surface of the package and one showed a level of 0.1 mR at contact. The confusion resulted from an error in the accompanying documentation.

No violations were identified.

7. Design Change Control

The inspector reviewed a random sample of Field Change Notices (FCN's) and held discussions with cognizant licensee personnel to determine the status of field design change control. The following documents were reviewed:

- Bechtel Procedure, 8031-JR-G-35, "Job Rule for the Preparation and Issuance of Field Change Notices"
- Bechtel Procedure, EDPI-4.62-1

FCN's:

5048M	47C	783C
3563M	121C	784C
3408M	126C	3103E
3228M	801C	3070E
2631M	820C	3052E
3636M	796C	986C
3774M	795C	

The inspector identified several unincorporated FCN's. However, the licensee informed the inspector that the identified FCN's were part of the backlog being incorporated into affected documents pursuant to the NRC finding 352/82-13-01, and the corrective action should be completed by the end of May, 1983.

The inspector, however, questioned the procedure for not incorporating FCN-986C into PSA-711. FCN 784C was reissued as FCN 784C, Rev. 1, but was later superseded by FCN 986C. Both previous FCN's required incorporation in drawings C-711 and PSA 711, however, the new FCN 986C required incorporation only in drawing C-711. The licensee informed the inspector that the changes in FCN 986C were dimensional changes, therefore, affecting only the civil drawings. Because the PSA drawings do not contain dimensions, it was not necessary to revise them.

No violations were identified.

8. Training

In conjunction with the design change inspection, the inspector reviewed the training records of the personnel involved in review and approval of FCN's. Bechtel Procedure, JR-C-2, "Job Rule for Orientation of Superintendents, Field Engineers, and Field Procurement Personnel" establishes the training requirements for these personnel. The inspector determined

that the engineers were properly indoctrinated and qualified prior to performing such activities.

No violations were identified.

9. Pipe Supports and Hangers

The inspector randomly selected eight large bore pipe supports and hangers, six inside containment and two inside the reactor building, for visual examination of the as-built configuration in comparison to that approved by the latest documentation. Document 8031-JR-M-17, "Job Rule for Field Control of Pipe Supports (Hangers)" describes the manner in which pipe supports are controlled from field procurement through final installation. The following supports were selected for examination to determine their conformance to the specified Job Rule:

DBA-107-H1	GBC-114-H1
DBA-107-H3	GBC-114-H2
EBB-109-H4	DLA-112-H7
EBB-109-H11	DLA-112-H13

No violations were identified.

10. Status of Preop/Start-up Tests

The inspector reviewed the status of Unit 1 preop/start-up tests. The licensee informed the inspector that 26.6% of the tests were complete. The licensee is 4.6% behind in the preop/start-up test schedule of 31%. However, to compensate for the delay, the licensee is planning to expedite system turnovers from construction with minor non-critical exceptions. The punch-list exceptions would be such that it would not affect the safety and/or test result validity during tests, and would be able to be completed after the acceptance of the turnover. The licensee also indicated that the Integrated Condensate flush was satisfactorily completed and air lines were blown in the reactor enclosure building. The inspector did not find any items of concern at this time.

11. Unresolved Items

Unresolved items are matters about which more information is needed to determine whether it is acceptable or a violation. Unresolved items are discussed in paragraph 5 of this report.

12. Exit Interview

At the conclusion of this inspection period, an exit interview was held with the members of the licensee staff (denoted * in paragraph 1). The inspector discussed the scope and findings of this inspection.