

# PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4502

JOHN S. KEMPER  
VICE-PRESIDENT  
ENGINEERING AND RESEARCH

September 21, 1982

Mr. Ronald C. Haynes, Director  
United States Nuclear Regulatory Commission  
Office of Inspection and Enforcement, Region I  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Subject: USNRC IE Region Letter dated August 24, 1982  
RE: Site Inspection of July 27-30, 1982  
Inspection Report No. 50-352/82-10  
Limerick Generating Station - Unit 1

File: QUAL 1-2-2 (352/82-10)

Dear Mr. Haynes:

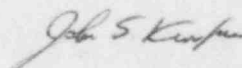
In response to the subject letter regarding items identified during the subject inspection of construction activities authorized by NRC License Nos. CPPR-106, we transmit herewith the following:

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,



JMP/kk/J2  
Attachment

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

S. K. Chaudhary, USNRC Resident Inspector

8210220374 821013  
PDR ADOCK 05000352  
Q PDR

ATTACHMENT I

RESPONSE TO APPENDIX A

Violation

10CFR50, Appendix B, Criterion V, the Limerick Generating Station (LGS) Preliminary Safety Analysis Report, Appendix D, Paragraph D.6.4, and the LGS Quality Assurance Plan, Section 5.0, Rev. 22 require activities affecting quality be prescribed and accomplished by documented instructions, procedures, or drawings, of a type appropriate to the circumstances.

Contrary to the above, on July 30, 1982, activities affecting quality in the construction and inspection of an instrument sensing line support bracket for Core Spray Pump (ICP-206) were not properly prescribed by nor accomplished in accordance with appropriate instructions, procedures, or drawings in that:

- (1) Drawing No. FJ-52-3, Rev. 0 did not properly prescribe a sensing line support bracket installation. The drawing did not accurately indicate the location and orientation of the bracket.
- (2) Drawing M-830-6013 limits the length of horizontal unistrut sensing line support brackets, which are vertically supported at one end only, to 12 inches. Drawing No. FJ-52-3 references Drawing M-830-6013 for installation details. The horizontal sensing line support bracket installation was not in accordance with Drawing M-830 in that it was approximately 24 inches in length.
- (3) Project Quality Control Inspection No. 8031/I-1.10, Rev. 7, "Inspection Record for Installation of Instruments," activity 3.2.C, requires sensing lines be inspected for proper support in accordance with Drawing M-830. Contrary to the inspection procedure requirements, the Quality Control inspection failed to identify the support deficiency and found the nonconforming installation acceptable.

Response to Violation

Bechtel Power Corporation Nonconformance (NCR) Number 5966 was issued on July 28, 1982 to document the nonconforming instrument support. The NCR was dispositioned to rework the existing installation. The rework was completed and inspected by Quality Control on August 24, 1982. The reworked installation is now in compliance with the requirements of instrument Drawing FJ-52-3 and Drawing M-830.

Response to Violation - Continued

A 100% inspection of all previously inspected instrument supports was performed to determine if other supports had similar conditions. The results of this reinspection indicate that this specific nonconforming condition was an isolated case.

In addition to this reinspection, another reinspection was performed of all completed and inspected instrument installations. The results of this reinspection have identified other nonconforming conditons requiring correction. All of these nonconformances will be corrected by December 31, 1982.

To prevent recurrence, a training course was conducted from August 9 through August 12, 1982 to reinstruct Instrument Field Engineering personnel in all existing requirements governing instrument installation. Also, a training course was conducted on August 18, 1982 to reinstruct the responsible Quality Control personnel regarding instrument support inspection requirements.

COMMONWEALTH OF PENNSYLVANIA :  
COUNTY OF PHILADELPHIA : ss:

JOHN S. KEMPER, being first duly sworn, deposes  
and says:

That he is Vice President of Philadelphia Electric  
Company, the holder of Construction Permit CPPR-106 for  
Limerick Generating Station Unit 1; that he has read the  
foregoing Response to Inspection Report No. 50-352/82-10  
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.

John S. Kemper

Subscribed and sworn to  
before me this 21<sup>st</sup> day  
of September, 1982

Patricia D. Scholl  
Notary Public

PATRICIA D. SCHOLL  
Notary Public, Philadelphia, Philadelphia Co.  
My Commission Expires February 10, 1986