

FEB 10 1983

Docket No. 50-352

Philadelphia Electric Company
ATTN: Mr. John S. Kemper
Vice President
Engineering and Research
2301 Market Street
Philadelphia, PA 19101

Gentlemen:

Subject: Inspection Report No. 50-352/82-16

This refers to the special safety inspection conducted by Mr. J. P. Durr of this office on November 29 - December 10, 1982 at Limerick Generating Station, Unit No. 1, Limerick, Pennsylvania of activities authorized by NRC License No. CPPR-106 and to the discussions of our findings held by Mr. Durr with yourself at the conclusion of the inspection, and to a subsequent telephone discussion between Mr. S. D. Reynolds of my staff and E. J. Coyle of your staff on December 27, 1981.

Areas examined during this inspection are described in the NRC Region I Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, measurements and observations made by the inspectors.

Based on the results of this inspection, it appears that one of your activities was not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A. This violation has been categorized by severity level in accordance with the NRC Enforcement policy (10 CFR 2, Appendix C) published in the Federal Register Notice (47 FR 9987) dated March 9, 1982. You are required to respond to this letter and in preparing your response, you should follow the instructions in Appendix A.

In addition to the apparent violation discussed above in Appendix A, "Notice of Violation", findings of this inspection also indicate that strengths and weaknesses exist in your construction program. These areas are discussed in Appendix B, "Significant Observations". You are requested to inform this office within thirty (30) days of the date of this letter of the results of actions you have taken or plan to take to improve your construction program in the area of the apparent program weaknesses identified in Appendix B.

The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures will be placed in the NRC Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of

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the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1). The telephone notification of your intent to request withholding, or any request for an extension of the 10 day period which you believe necessary, should be made to the Supervisor, Files, Mail and Records, USNRC Region I, at (215) 337-5223.

Your cooperation with us in this matter is appreciated.

Sincerely,

ORIGINAL SIGNED BY

T.T.M.

Thomas T. Martin, Director
Division of Engineering and Technical
Programs

Enclosures:

1. Appendix A, Notice of Violation
2. Appendix B, Significant Observations
3. NRC Region I Inspection Report Number 50-352/82-16

cc w/encls:

V. S. Boyer, Senior Vice President, Nuclear Power
Troy B. Conner, Jr., Esquire
Eugene J. Bradley, Esquire
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
Commonwealth of Pennsylvania
NRC Resident Inspector

bcc w/encls:

Region I Docket Room (with concurrences)
Senior Operations Officer (w/o encls)
E. Chan, OELD
Ebe McCabe, DPRP Section Chief
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RI/for
RI:DETP
Durr/pja
2/8/83
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RI/for
RI:DETP
Ebnetter
2/10/83

RI/for
RI:DETP
Martin
2/10/83

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Appendix B

Significant Observations

Philadelphia Electric Company
Limerick Unit No. 1

Docket No. 50-352
License No. CPPR-106

As a result of the inspection conducted November 29 - December 10, 1982, the following significant observations were identified in the implementation of your construction program:

Program Strengths:

1. Philadelphia Electric Company engineers and managers are formally indoctrinated in quality assurance.
2. Following ASME Section III NDE acceptance, the weldments associated with the reactor pressure vessel nozzle field modifications were tested with a supplementary ultrasonic inspection simulating future preservice inspection (PSI) requirements. This supplementary test should preclude unexpected results during PSI testing which have resulted in problems at other sites.
3. Philadelphia Electric Company quality assurance audits and surveillances have a thoroughly comprehensive scope and have findings addressing technical adequacy in addition to program, specification, and procedure compliance.

Program Weaknesses:

1. Construction Office Field Memorandum and Bechtel Field Communication Control action items are not tracked for completion.
2. Philadelphia Electric Company procedures for processing open audit findings need more explicit guidance to improve closure timeliness.

The following program weaknesses were identified and adequately addressed before completion of the inspection. No response is required.

1. Bechtel drawings supplied to GE-I&SE were not controlled in accordance with the GE-I&SE quality assurance manual. Bechtel Job Rule (JR) E-4 was revised to show that control of Bechtel drawings used by GE-I&SE are the responsibility of Bechtel; the GE-I&SE quality assurance manual does not apply.
2. The requirements for issuance of a Nonconformance Report (NCR) for unsatisfactory polarity index readings were not clearly stated in Job Rule (JR) E-1. The inspector concluded that no safety concern resulted from these polarity index readings and that Revision 14 to Job Rule E-1 would resolve the reporting requirements.