



## PHILADELPHIA ELECTRIC COMPANY

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DEC 21 1982

JOHN S. KEMPER  
VICE-PRESIDENT  
ENGINEERING AND RESEARCH

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

Subject: US NRC IE Region Letter dated November 23, 1982  
RE: Site Inspection of October 4 - November 14, 1982  
Inspection Report No. 50-352/82-13

File: QUAL 1-2-2 (352/82-13)

Dear Mr. Haynes:

In response to the subject letter regarding items identified during the subject inspection of construction activities authorized by 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,

JMC/nmk  
Attachment

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

S. K. Chaudhary, US NRC Resident Inspector

## ATTACHMENT I

### RESPONSE TO APPENDIX A

#### Violation

10CFR50, Appendix B, Criterion V requires that activities affecting quality be accomplished in accordance with prescribed instructions, procedures, or drawings. Bechtel Procedure EDPI-4.47.0, Paragraph 2.1.d, directs that any Field Change Request (FCR) received 15 days prior to issue of a drawing revision shall be incorporated in that drawing revision.

Contrary to the above, FCR's M-11, 559F and M-11, 939F to drawing No. GBB-102-H1, issued on or before June 1 and June 25, 1982 respectively, were not incorporated into a September 30, 1982 revision to that drawing.

#### Response to Violation

During this Inspection, Philadelphia Electric Company presented an open Quality Assurance Finding, No. G-160, which previously identified the generic problem of incorporating drawing change notices including revising drawings without incorporating open drawing changes. Although our finding did not specifically identify Drawing GBB-102-H1, it clearly identified the generic condition.

Philadelphia Electric requests that this item be changed from a Violation to an Unresolved Item.

Whether the item remains as a Violation or an Unresolved Item, the action taken is as follows:

The FCR's M-11, 559F and M-11, 939F were not incorporated in the drawing, since they were cancelled as noted in your Inspection Report 50-352/82-13, paragraph 4.a. Hence, no further action is required on the specific items.

With regard to preventing recurrence, it was determined that the two FCR's in question were reviewed prior to revising Drawing GBB-102-H1. However, the approvals of the rejected FCR's took longer than the approval of the revised drawing. This was due to the critical management scrutiny given when San Francisco Project Engineering rejects field change requests.

To prevent recurrences of this, the responsible individuals were re-instructed in the procedural requirements.

In addition, we will continue to pursue resolution of Finding Report G-160.

COMMONWEALTH OF PENNSYLVANIA :  
COUNTY OF PHILADELPHIA : ss.

JOHN S. KEMPER, being first duly sworn, desposes  
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 the foregoing  
Response to Inspection Report No. 50-352/82-13 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 DECEMBER 1982

Patricia D. Scholl  
Notary Public

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