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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
)	
Philadelphia Electric Company)	Docket Nos. 50-352
)	50-353
(Limerick Generating Station)	
Units 1 and 2))	

APPLICANT'S ANSWERS TO
INTERVENOR AWPP'S TENTH SET OF
INTERROGATORIES ON QA/WELDING CONTENTION

DISCOVERY 25
FEBRUARY 1, 1984

Interrogatory No. 1

AWPP requests specific material that will not require searching through voluminous records.

To the extent that Applicant possesses information or documents expressing facts or opinions which are relevant to Contention VI-I, but which do not support Applicant's position or which have not otherwise been fully provided in the answers by Applicant, please provide such information and documents. One example would be knowledge of repeated welding infractions that have characterized Bechtel performance (as at Zimmer and Midland).

Answer

Applicant had made a large number of documents available and has offered the opportunity to review Quality Assurance records related to safety related welding.

The Applicant is not aware of any specific documentation which support Contention VI-1:

"Applicant has failed to control performance of welding and inspection thereof in accordance with quality control and quality assurance procedures and requirements, and has failed to take proper and effective corrective and preventive actions when improper welding has been discovered."

This response by Applicant also considers the results of inspections, audits, surveillances and monitoring which have been performed since the dates the requested information was made available to AWPP to present.

For completeness, reports of welding-related audits that have been generated since the Quality Assurance records were supplied

in response to the Board's October 28, 1983 Memorandum and Order and, completed Bechtel Nonconformance Reports and PECO Finding Reports which have been previously provided (Discovery 14, Item 7) are being provided (Discovery 25, Item 1).

Participants in Preparation of Answer

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Field Branch Head
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Interrogatory No. 2a

Re V. S. Boyer affidavit of September 16, 1983 --why were Bechtel records in error? Why 350 stated Ferretti inspected than later 709?

Answer

The number 350 originally stated was an approximate number of accessible welds reinspected by Bechtel in 1976. The number 709 was changed to 1235 in the Applicant's Second Interim Report to the Atomic Safety and Licensing Board dated October 4, 1983. The breakdown of these welds is as stated in Paragraph 12', page 1 of the above report.

Participants in Preparation of Answer

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Quality Assurance - Engineer
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Interrogatory No. 2b

Why so unsure as to say "some additional deficiencies may be present?"

Answer

Paragraph 14 of the Applicant's Interim Report to the Atomic Safety and Licensing Board relative to Contention VI-1 dated September 16, 1983 stated that the review was continuing. Paragraph 6 of the Applicant's Second Interim Report to the Licensing Board relating to Contention VI-1 reported the results of the Company's physical reinspection program.

Participants in Preparation of Answer

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Interrogatory No. 2c

Supply every record and affidavit involved in the above reconciliation of known and unknown questionable deficiencies.

Answer

Documents related to the 1983 re-evaluation of the welding deficiencies identified in NRC Inspection Report 50-353-76/06, Item 1 had been previously made available (Discovery 14, Item 7). Applicant's Interim Reports to the Atomic Safety and Licensing Board relating to Contention VI-1 dated September 16, 1983, and October 4, 1983, with associated affidavits, were previously provided to the service list.

Participants in Preparation of Answer

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COMMONWEALTH OF PENNSYLVANIA

:

: ss.

COUNTY OF PHILADELPHIA

:

V. S. Boyer, being first sworn, deposes and states:

That he is Senior Vice President of Philadelphia Electric Company, the Applicant herein; that he had read the foregoing Applicant's Answers to Intervenor AWPP's Tenth Set of Interrogatories on QA/Welding 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.

V. S. Boyer
Senior Vice President

Subscribed and sworn to
before me this 1st day
of February, 1984.

Patricia D. Scholl
Notary Public

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