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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY  
PHILADELPHIA, PENNSYLVANIA  
19104

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 TWELFTH SET OF  
INTERROGATORIES ON QA/WELDING CONTENTION

DISCOVERY 24  
FEBRUARY 1, 1984

Interrogatory No. 1

Pursuant to the Board's Order concerning formal discovery, AWPP requests the following re Contention VI-I (Quality Assurance/Control). AWPP requests specific material that will not require searching through voluminous records.

Re "Applicant's Interim Report to the Licensing Board Relating to Contention VI-I" dated September 16, 1983, in particular, Affidavit of Vincent S. Boyer, wherein Mr. Boyer affirms "there are initial indications, not yet confirmed, that some additional deficiencies may be present".

Please provide all documents, logs and reports on all safety related welds involved.

Answer

All documents and reports 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-I dated September 16, 1983, and October 4, 1983, with associated affidavits, were previously provided to the service list.

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Interrogatory No. 2

At 5b page 3, what deficiencies noted; what corrective action; completion date and manner of correction; and by whom signed off?

Answer

The deficiencies referred to are described on Bechtel Nonconformance Reports 1998 and 2000 with the disposition, corrective action, completion, and acceptance also documented on these reports. Bechtel Nonconformance Reports 1998 and 2000 had been previously provided (Discovery 14, Item 7).

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Interrogatory No. 3

Re Par. 12, what were the "four minor deficiencies noted"?

Answer

The "four minor deficiencies noted" are described on Bechtel Nonconformance Reports 1998, 2000, and 2710. Applicant's Second Interim Report to the Atomic Safety and Licensing Board relating to Contention VI-I dated October 4, 1983 corrects the Applicant's earlier interim report stating in paragraph 13', page 2, that there were "6 minor deficiencies noted". The increase from 4 to 6 results from including the two deficiencies originally identified in IE Inspection Report 50-353/76-06 Item 1 which were also documented on Bechtel Nonconformance Report 1980. These Bechtel Nonconformance Reports had been previously provided (Discovery 14, Item 7).

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Interrogatory No. 4

Is 1% of accessible welds improperly inspected permitted by NRC?

Answer

Applicant is not aware of any NRC document that permits any percentage of accessible welds to be improperly inspected.

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Interrogatory No. 5

How were those 4 dispositioned?

Answer

As explained in response to Interrogatory 3, there are six minor deficiencies. These were dispositioned rework (four welds) and use-as-is (two welds). See Bechtel Nonconformance Reports 1980, 1998, 2000, and 2710 (Discovery 14, Item 7).

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Interrogatory No. 6

How were the remaining 31 welds dispositioned?

Answer

The number of 31 welds given as inaccessible was corrected to 3 in paragraph 5, page 4 of Applicant's Second Interim Report to Atomic Safety and Licensing Board relating to Contention VI- . The change resulted from the initial inclusion of non-safety grade welds in the inaccessible count as explained in the above report. Bechtel Nonconformance Report 2710 (Discovery 14, Item 7), documents the disposition of these three inaccessible welds as use-as-is.

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Interrogatory No. 7a

Re Paragraph 13--one reinspected weld out of 16 is 6%. Are those 6% improperly inspected welds within NRC Quality Assurance/Quality Control permissible limits?

Answer

See response to Interrogatory No. 4

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Interrogatory No. 7b

On what basis is there assurance that "engineering analysis (is) continuing to disposition the 212, partially or totally inaccessible welds..." will, without any doubt whatsoever, that they in fact are not different? (AWPP has not received any report although stated to be done on October 16, 1983).

Answer

Applicant's Second Interim Report to the Atomic Safety and Licensing Board relating to Contention VI-I in Paragraph 13', page 2, stated that the welds referred to have been found by engineering analysis to be acceptable. The Bechtel Nonconformance Reports 7951, 8095 and 8125 (Discovery 14, Item 7) document the engineering disposition relating to these welds.

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Interrogatory No. 7c

19 minor deficiencies out of 47 is approximately 25%. Is 25% of welds previously inspected and checked off as properly performed permitted by QA/QC of the NRC.

Answer

See response to Interrogatory No. 4.

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Interrogatory No. 7d

Re Par. 14, what does Applicant mean by "representative number of welds for which the subject inspector was responsible?"

Answer

Applicant's Second Interim Report to the Atomic Safety and Licensing Board relating to Contention VI-I dated October 4, 1983, Paragraph 6, page 4, states that 67 safety-related structural welds were reinspected by the Applicant.

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Interrogatory No. 7e

How many welds will be in the "representative number"?

Answer

See response to Interrogatory 7d.

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Interrogatory No. 7f

Who determines which welds will be in the "representative number" selected?

Answer

The welds reinspected by the Applicant were determined by the PECO. Quality Assurance Field Branch Head.

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Interrogatory No. 7g

What is the total proportion which the "representative sample" is to represent?

Answer

Applicant's Second Interim Report to the Atomic Safety and Licensing Board relating to Contention VI-I, paragraph 6, describes the Applicant's physical reinspection program and states that there were 439 welds in the group from which the sample was taken.

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Interrogatory No. 7h

Will that number meet statistical procedures regarding validity of results?

Answer

The number of welds sampled was judged by the PECO. Quality Assurance Field Branch Head as representative of accessible structural welds.

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Interrogatory No. 7i

Please provide affidavit that above statistical standard is met.

Answer

See response to Interrogatory 7h.

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Interrogatory No. 7j

Please provide complete information, reports, logs, inspectors involved, test to be run, welds involved and locations of such welds.

Answer

Surveillance Check Report G-87 (Discovery 14, Item 7) documents the Applicant's physical reinspection and the results of the reinspection for those structural welds referred to in Interrogatory 7d above.

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Interrogatory No. 7k

Were any other welders or welding inspectors separated, discharged, or transferred due to improper workmanship, efficiency, or other deficiency, including use of drugs or alcohol?

Answer

Bechtel Power Corporation has separated, discharged, or transferred welders from work at Limerick for reasons such as those listed above. No Bechtel Power Corporation welding inspectors have been separated, discharged or transferred for reasons such as those listed above. Also see response to Discovery 17, Item 4.

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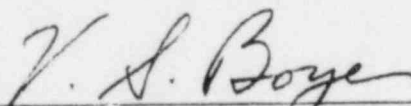
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COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF PHILADELPHIA

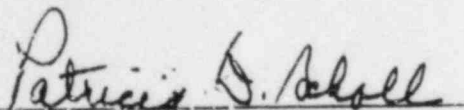
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: SS.  
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V. S. Boyer, being first sworn, deposes and states:

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 Twelfth 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.

  
\_\_\_\_\_  
Senior Vice President

Subscribed and sworn to  
before me this 1<sup>st</sup> day  
of February, 1984.

  
\_\_\_\_\_  
Notary Public

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

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of )  
 )  
Philadelphia Electric Company ) Docket Nos. 50-352  
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CERTIFICATE OF SERVICE

I hereby certify that copies of a letter to Frank R. Romano from Mark J. Wetterhahn dated February 3, 1984, "Applicant's Answers to Intervenor AWPP's Tenth Set of Interrogatories on QA/Welding Contention," "Applicant's Answers to Intervenor AWPP's Eleventh Set of Interrogatories on QA/Welding Contention," and "Applicant's Answers to Intervenor AWPP's Twelfth Set of Interrogatories on QA/Welding Contention" all dated February 1, 1984 in the captioned matter, have been served upon the following by deposit in the United States mail this 3rd day of February, 1984:

- |  |  |
|--|--|
| *Lawrence Brenner, Esq. (2)<br>Atomic Safety and Licensing<br>Board<br>U.S. Nuclear Regulatory<br>Commission<br>Washington, D.C. 20555 | Atomic Safety and Licensing<br>Appeal Panel<br>U.S. Nuclear Regulatory<br>Commission<br>Washington, D.C. 20555   |
| *Dr. Richard F. Cole<br>Atomic Safety and<br>Licensing Board<br>U.S. Nuclear Regulatory<br>Commission<br>Washington, D.C. 20555        | Docketing and Service Section<br>Office of the Secretary<br>U.S. Nuclear Regulatory<br>Commission<br>Washington, D.C. 20555                                    |
| *Dr. Peter A. Morris<br>Atomic Safety and<br>Licensing Board<br>U.S. Nuclear Regulatory<br>Commission<br>Washington, D.C. 20555        | *Ann P. Hodgdon, Esq.<br>Counsel for NRC Staff Office<br>of the Executive<br>Legal Director<br>U.S. Nuclear Regulatory<br>Commission<br>Washington, D.C. 20555 |

\* Hand Delivery

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