

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4502

JOHN S. KEMPER
VICE-PRESIDENT
ENGINEERING AND RESEARCH

FEB 3 1984

Mr. Thomas E. Murley, Director
United States Nuclear Regulatory Commission
Office of Inspection and Enforcement, Region I
631 Park Avenue
King of Prussia, PA 19406

Subject: USNRC IE Region I Letter Dated January 05, 1984
RE: Site Inspection of October 31-November 04, 1983
Inspection Report No. 50-352/83-17
Limerick Generating Station, Unit 1

File: QUAL 1-2-2 (352/83-17)

Dear Mr. Murley:

In response to the subject letter regarding items identified during the subject inspection of construction activities authorized by NRC License No. CPPR-106, we transmit herewith the following:

Attachment I - Response to Appendix A

Also enclosed 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,

JW Ballyha
for
J S Kemper

JPE/drd/84C130-1

Attachment

Copy to:

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

S. K. Chaudhary, USNRC Resident Inspector

8402220348 840215
PDR ADOCK 05000352
PDR
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ATTACHMENT I

RESPONSE TO APPENDIX A

VIOLATION A

10CFR Part 50 Appendix B Criterion III states in part, "Measures shall be established to assure that applicable regulatory requirements and the design basis...are correctly translated into specifications, drawings, procedures and instructions."

Contrary to the above, as of November 4, 1983, a design basis for the Standby Liquid Control System, requiring the piping support SP-ECB-114-E4-H4 to be installed on the containment building for stress and seismic reasons, was not translated into specifications, drawings and installation instructions and the said support was incorrectly installed on the Reactor Building.

RESPONSE TO VIOLATION A

An analysis incorporating the Seismic Anchor Movement (SAM) effects has been performed for the identified hanger and associated piping. The analysis results showed that the installed condition is acceptable.

Resident Engineering Memorandums issued regarding Class 1 and non-Class 1 ISO interfaces were reviewed. The review determined that the other SAM interfaces resulted in properly designed pipe supports.

To prevent recurrence, Resident Engineering Memorandums will no longer be used for design interface. Instead, the information which had been transmitted via Resident Engineering Memorandums will now be included in interim (letter) revisions of ISO drawings. Field Job Rule M-12 and G-5 have been revised to incorporate this change.

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF PHILADELPHIA :

ss.

JOSEPH W. GALLAGHER, being first duly sworn, deposes and says:

That he is Manager, Engineering and Research Department 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. 50-352/83-17 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.

Joseph W. Gallagher

Subscribed and sworn to
before me this 3RD day
of FEBRUARY, 1984

Judith Y. Franklin

JUDITH Y. FRANKLIN
Notary Public, Phila., Phila. Co.
My Commission Expires July 28, 1987