

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company
Limerick Generating Station, Unit No. 1

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

As a result of the inspection conducted on June 11-22, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register Notice 49 FR 8583 (March 8, 1984), the following violations were identified:

- A. 10 CFR 50, Appendix B, Criterion V requires that safety related components be installed in accordance with approved drawings. The Limerick PSAR, Paragraph 6.4, states in part, "Bechtel Construction Department ... is responsible for construction of the plant to approved engineering specifications.
- (1) Pipe support drawing HBB-108-H6, Revision 9, "Note", states, "Cut clamp here to avoid interference if necessary. Maintain minimum 2-bolt diameter distance from centerline bolt load to cut."
 - (2) Pipe support drawing HBB-129-H8A, Revision 10, requires two stiffener plates, 3/8" x 2 1/4" x 7 1/4", item 7, to be welded into the recess formed by the flanges and web of the W8x17 beam, item 3.
 - (3) Specification SFPD-7902-5, Revision 3, paragraph 3.1.E., requires that pipe support base plate anchor bolts must be installed such that at least two threads remain below the surface of the plate.
 - (4) Pipe support drawing HBC-194-H901 depicts the pipe penetrating the embed anchor concentrically.

Contrary to the above, on or before June 11, 1984:

- (1) Pipe support HBB-108-H6 was installed with the pipe clamp bolt to cut edge distance with less than 2 bolt diameters.
- (2) Pipe support EBB-129-H8A was installed without the two, 3/8"x2 1/4"x7 1/4" stiffeners on beam item #3.
- (3) Pipe support base plate HBB-138-H24 was installed such that less than two threads remained below the surface of the base plate on one bolt.
- (4) Pipe support HBC-194-H901 was installed such that the pipe penetrated the embed anchor 1 1/2" eccentrically.

The foregoing are considered to be a Severity Level IV Violation (Supplement II).

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- B. Appendix B, Criterion III, states, in part that, "Measures shall also be established for the selection and review for suitability of application of materials, parts, equipment and processes that are essential to the safety-related functions of the structures, systems and components."

Rosemount Installation Drawing #H39219-0602 Note 11, states in part that, "The terminal side of the electronics housing must be sealed from the external environment."

Specification Drawing No. E-1406, Sheet 4.6 defines conduit sealing requirements applicable to instrument located in specific humid areas.

Contrary to the above, on June 19, 1984, the inspectors identified instruments in areas identified by specification M-171 as humid areas that were not sealed. These humid areas were not addressed in Specification Drawing No. E-1406.

This is a Severity Level V Violation (Supplement II).

Pursuant to the provisions of 10 CFR 2.201, Philadelphia Electric Company is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.