

PHILADELPHIA ELECTRIC COMPANY

2840748750

2301 MARKET STREET  
P.O. BOX 8699  
PHILADELPHIA, PA. 19101

(215) 841-4504

JUN 20 1984

JOSEPH W. GALLAGHER  
MANAGER  
ENGINEERING AND RESEARCH

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 March 21, 1984  
Reference: Site Inspection of April 1-30, 1984  
Inspection Report No. 50-352/84-19  
and 353/84-06  
File: QUAL 1-2-2 (352/84-19 and 353/84-06)

Dear Mr. Murley:

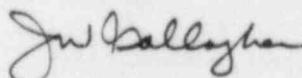
In response to the subject letter regarding items identified during the subject inspection of construction activities authorized by NRC License Nos. CPPR-106 and -107, we transmit herewith the following:

Attachment I - Response to Appendix A

Also enclosed is an affidavit relating to the response.

Should you have any question concerning these items, we would be pleased to discuss them with you.

Sincerely,



JMC/drd/840615-1

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

S. K. Chaudhary, USNRC Resident Inspector

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ATTACHMENT I

RESPONSE TO APPENDIX A

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A. VIOLATION

10 CFR 50, Appendix B, Criterion III requires the establishment of measures to assure that applicable design basis for systems and components are correctly translated into drawings.

Section 3 of Volume 1 of the Limerick Generating Station Quality Assurance Plan implements these requirements of Criterion III.

Contrary to the above, as of April 24, 1984, the measures established to incorporate implemented design changes into applicable drawings failed to assure that all changes made to the high pressure coolant injection system by Design Change Package 232 were reflected in Piping and Instrumentation Diagram M42.

RESPONSE

An IDCN has now been issued to include the appropriate information on P&ID M-42.

This condition appears to be unique in that this GE initiated change was made in an advance drawing revision and hence Bechtel did not recognize the need to revise their P&ID when this design change was processed. However, several other DCP's were reviewed to verify satisfactory engineering, inter-disciplinary coordination and no other problems were identified.

ATTACHMENT I

RESPONSE TO APPENDIX A

B. VIOLATION

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by appropriate procedures and these procedures shall be followed during performance of these activities.

Startup Administrative Procedure AD 1.2-2 and Appendix Z to Volume 1 of the Limerick Generating Station Quality Assurance (QA) Plan require that Startup Nonconformance Reports be reviewed by the licensee's Quality Control and Quality Assurance organizations to determine if conditions exist which require reporting to the NRC per 10 CFR 50.55e.

Contrary to the above, AD 1.2-2 and Appendix Z to the QA Plan were not effectively followed in that the review provided for Startup Nonconformance Reports S-346-M, S-347-M, and S-414-M, involving failures to electrohydraulic operators for ventilation system dampers, failed to identify that these failures constituted a condition which warranted reporting.

RESPONSE

The condition of failures of electrohydraulic operators for the ventilation system dampers identified on the Startup Nonconformance Reports has now been evaluated for reportability per 10 CFR 50.55e through the Startup nonconformance trend analysis process and was reported to the NRC on May 25, 1984.

To prevent a recurrence of this condition, Procedure QADP-27.1 - Procedure for Performance of Startup Nonconformance Report Trend Analysis has been revised to address evaluation for reportability per 10 CFR 50.55e.

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352/84-19  
and  
353/84-06

ATTACHMENT I

RESPONSE TO APPENDIX A

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C. VIOLATION

10 CFR 50, Appendix b, Criterion V requires that activities affecting quality shall be prescribed by appropriate procedures.

Section 16 of the Startup Activity Section of the Limerick Generating Station Quality Assurance Plan requires that measures shall be established to assure conditions adverse to quality are promptly identified, reported and corrected.

Contrary to the above, the measures necessary to promptly identify, report and correct those conditions adverse to quality which were associated with facility buildings, areas and rooms were not prescribed by appropriate Startup Administrative procedures as required by the Limerick Quality Assurance Plan.

RESPONSE

The need for construction to complete the diesel generator building roofing, including finish roofing and flashing, was on the construction work list prior to Startup personnel noticing the condition.

With regard to the apparent confusion regarding which of the corrective action systems applied to facilities, the following steps have been taken to prevent such a recurrence.

- 1) Startup revised Administrative Procedure AD 1.2, Startup Nonconformance Report (NCR) to address nonconformance reporting on facilities.
- 2) Startup issued a Training Bulletin discussing how Startup should report deficiencies identified on facilities.
- 3) Construction Division procedure CPL-9 Procedure for Facility Turnover and Facility Post Turnover Activities has been issued defining responsibilities for facility controls after turnover.

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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 Permits  
CPRR-106 and CPRR-107 for Limerick Generating Station Units 1 and 2;  
that he has read the foregoing Response to Inspection Report No. 50-352/84-19  
and 50-353/84-06 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.

JW Gallagher

Subscribed and sworn to  
before me this 20<sup>th</sup> day  
of June 1984

Patricia D. Scholl  
Notary Public

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

JUN 20 1984  
RECORDED