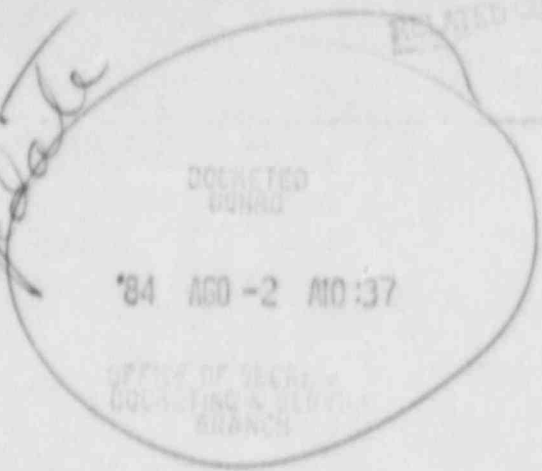


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*update*



RELATED CORRESPONDENCE

JUL 19 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 June 20, 1984  
 RE: Site Inspection of May 1-31, 1984  
 Inspection Report No. 50-352/84-24 & 50-353/84-08 *OL*  
 Limerick Generating Station - Units 1 and 2  
 File: QJAL 1-2-2 (352/84-24 & 353/84-08)

Dear Mr. Murley:

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

Attachment I - Response to Appendix A

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

Sincerely,

*John S. Kemp*

JPE/lid/  
 Attachment

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

S. J. Chaudhary, USNRC Resident Inspector

cc: Limerick Service List

8408310124 840717  
 PDR ADOCK 05000352  
 G PDR

cc: Judge Lawrence Brenner (w/enclosure)  
Judge Peter A. Morris (w/enclosure)  
Judge Richard F. Cole (w/enclosure)  
Troy B. Conner, Jr., Esq. (w/enclosure)  
Ann P. Hodgdon, Esq. (w/enclosure)  
Mr. Frank R. Romano (w/enclosure)  
Mr. Robert L. Anthony (w/enclosure)  
Maureen Mulligan (w/enclosure)  
Charles W. Elliott, Esq. (w/enclosure)  
Zori G. Ferkin, Esq. (w/enclosure)  
Mr. Thomas Gerusky (w/enclosure)  
Director, Penna. Emergency (w/enclosure)  
Management Agency  
Angus Love, Esq. (w/enclosure)  
David Wersan, Esq. (w/enclosure)  
Robert J. Sugarman, Esq. (w/enclosure)  
Martha W. Bush, Esq. (w/enclosure)  
Spence W. Perry, Esq. (w/enclosure)  
Jay M. Gutierrez, Esq. (w/enclosure)  
Atomic Safety & Licensing Appeal Board (w/enclosure)  
Atomic Safety & Licensing Board Panel (w/enclosure)  
Docket & Service Section (w/enclosure - 3 copies))  
James Wiggins (w/enclosure)  
Timothy R. S. Campbell (w/enclosure)

ATTACHMENT IRESPONSE TO APPENDIX AA. VIOLATION

10 CFR 50 Appendix B, Criterion III requires that measures be established to assure that applicable design bases for safety-related systems are correctly translated into drawings.

Section 3 of Volume 1 of the Limerick Generating Station Quality Assurance Plan implements these requirements of 10 CFR 50.

Contrary to the above, the design bases for the main steam isolation valve leakage control system were not correctly translated into all drawings in that (1) the requirement for screens over the system's dilution air inlets described on piping and Instrumentation Diagram (P&ID) M-40 was not translated onto two isometric drawings; and (2) the seismic classifications of four of the system process lines shown on P&ID M-40 were not correctly translated onto three isometric drawings and four field sketch drawings.

RESPONSE

- 1) Piping Isometric drawing HBB-157-1 and HBB-158-1 were revised to add inlet screens to agree with the note on P&ID M-40. DCP#0445 was issued to accomplish this work.

Other P&ID's were reviewed for notes which could affect Isometric drawings and no other deficiencies were identified.

Additionally, a memorandum was issued to Bechtel Project Engineering personnel involved in design work reminding them to verify design with P&ID notes.

- 2) The Seismic Classifications on the three piping Isometric drawings and four piping Field Sketches were corrected.

Other piping Isometrics and Field Sketches were reviewed and corrected as necessary.

Seismic category information is not pertinent to the field and therefore will not be put on Field Sketches in the future. The responsible personnel were issued a memorandum reminding them regarding placing correct information on the Isometrics.

B. VIOLATION

10 CFR 50 Appendix B, Criterion V and the Limerick Quality Assurance Plan, Section 5 require that activities affecting quality shall be accomplished in accordance with appropriate procedures. Bechtel Job Rule 8031-JR-G-7, Appendix B, Paragraph 8.0 requires that equipment be covered adequately so that dirt or other foreign materials can not enter therein.

Bechtel Job Rule 8031-JR-G-8, Paragraph 9.4.1.2 requires that equipment be installed with closed end caps. Bechtel Job Rule 8031-JR-G-11, Paragraph 4.0 requires that the basic rules of good housekeeping shall be implemented to provide safe and efficient working and storage conditions and eliminate potential hazards.

Contrary to the above, as of May 14, 1984 the following were identified:

- a. The Drywell fan (2AV212) was wrapped with torn and inadequate cover.
- b. The pipe spools EBB-202-1-4, EBB-201-1-7 and EBB-201-1-9 had no closed end caps installed. The pipe spools EBB-202-1-8 and EBB-203-1-9 were inadequately protected at the ends. One downcomer, at drywell area, elevation 238', was in-place without end cover.
- c. The Diesel Oil Transfer Pump (2AP514) was surrounded by debris and dirt had infiltrated around the motor shaft area.

RESPONSE

Items A, B and C were inspected for damage, deterioration and cleanliness. No adverse affects on the quality of the equipment was found. This inspection is documented on Quality Control Inspection Report BK538.

Items A and B:

The Drywell Fan, pipe spools and downcomer pipe were recovered to protect them from dirt and debris.

Item C:

The Diesel Oil transfer pump area was cleaned and in addition, more stringent controls were placed in effect to maintain cleanliness requirements.

The maintenance inspection frequencies for the Drywell Fans and Diesel Oil Transfer Pumps have been increased. Procedures providing for In-Place Storage Inspection of Downcomer Piping which includes QC verification have been placed in effect as defined in Revision 25 of Job Rule G-8.

Verification of the above response is documented by the Licensee on Surveillance Check Report G-102.