



Appendix B

Significant Observations

Philadelphia Electric Company  
Limerick Unit No. 1

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

As a result of the inspection conducted November 29 - December 10, 1982, the following significant observations were identified in the implementation of your construction program:

Program Strengths:

1. Philadelphia Electric Company engineers and managers are formally indoctrinated in quality assurance.
2. Following ASME Section III NDE acceptance, the weldments associated with the reactor pressure vessel nozzle field modifications were tested with a supplementary ultrasonic inspection simulating future preservice inspection (PSI) requirements. This supplementary test should preclude unexpected results during PSI testing which have resulted in problems at other sites.
3. Philadelphia Electric Company quality assurance audits and surveillances have a thoroughly comprehensive scope and have findings addressing technical adequacy in addition to program, specification, and procedure compliance.

Program Weaknesses:

1. Construction Office Field Memorandum and Bechtel Field Communication Control action items are not tracked for completion.
2. Philadelphia Electric Company procedures for processing open audit findings need more explicit guidance to improve closure timeliness.

The following program weaknesses were identified and adequately addressed before completion of the inspection. No response is required.

1. Bechtel drawings supplied to GE-I&SE were not controlled in accordance with the GE-I&SE quality assurance manual. Bechtel Job Rule (JR) E-4 was revised to show that control of Bechtel drawings used by GE-I&SE are the responsibility of Bechtel; the GE-I&SE quality assurance manual does not apply.
2. The requirements for issuance of a Nonconformance Report (NCR) for unsatisfactory polarity index readings were not clearly stated in Job Rule (JR) E-1. The inspector concluded that no safety concern resulted from these polarity index readings and that Revision 14 to Job Rule E-1 would resolve the reporting requirements.