

APPL. Ex. 98

REF: 52



DEC -4 1978

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

Subject: USNRC IE, I Letter dated June 16, 1978
 RE: Site Inspection of May 16-23, 1978
 Inspection Report No. 50-352/78-07; 50-353/73-04
 Limerick Generating Station - Units 1 & 2
 → File: QUAL 1-2-2 (352/78-07)
 QUAL 1-2-2 (353/73-04)

Dear Mr. Crier:

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

Attachment I - Response to Appendix A

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

Sincerely,

A handwritten signature in dark ink, appearing to read "W. J. Johnson".

EC-16 12-4-78
Ann. 12/10/78
JHC/mmk 12/11/78
12/11/78

Attachment

bcc: R. H. Elias, Bechtel
 J. S. Kemper
 E. J. Bradley
 G. White
 E. C. Kistner
 H. R. Walters/Local File (3)
 J. J. Clarey
 R. A. Mulford
 J. M. Corcoran ✓
 W. J. Johnson/R. H. Zong
 Project File (2)

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 PDR ADDCK 05000352
 PDR

ATTACHMENT I

RESPONSE TO APPENDIX A

Response to Item of Noncompliance

Infraction

10CFR50, Appendix B, Criterion V, states in part, that: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings . . . and shall be accomplished in accordance with these instructions, procedures, or drawings."

The Limerick PSAR, Appendix D, Quality Assurance Program, paragraph 6.4, states, in part, that: "Bechtel Construction Department. . . is responsible for construction of the plant to approved engineering specifications, drawings and procedures . . ."

The Peabody Testing Inc., a contractor to Bechtel, utilizes nondestructive examination procedure titled "Liquid Penetrant Inspection of Welds and Components," IPPT-340-39-02, Amendment No. 2, which states, in part, in paragraph 6.6.3, that: ". . . final interpretation shall be made a minimum of seven minutes and no later than thirty minutes after the developer is applied."

Contrary to the above, on September 28, 1978, during the liquid penetrant test of weld joint HEC-182-1/0-FW50, the licensee's contractor technician made interpretations before the seven minute developer dwell time had elapsed.

Response

1. Background

Peabody performed an investigation of Peabody's Annual NDE Personnel Performance Audits of Peabody personnel presently and previously employed at the Limerick Site. This investigation revealed that liquid penetrant examinations audited were performed in accordance with applicable procedures. Additionally, the investigation included all previous Peabody six (6) month audit reports performed on Peabody facilities at Limerick Site. These

reports revealed that liquid penetrant examinations witnessed during these audits were performed in accordance with applicable procedures. Based upon these investigations, the Peabody Testing Quality Control Manager provided assurance that this liquid penetration examination was an isolated incident and that other liquid penetrant examinations performed by Peabody personnel at the Limerick Site have been performed to applicable requirements.

2. Corrective Action Taken and Results Achieved

- a. The NDE technician in question was re-qualified for liquid penetrant examination by Peabody Testing. The practical portion of the examination was witnessed by the ASME Code Inspector and by representatives of the Bachtel Q.C. Department. The re-qualification certification were approved by Bachtel on October 13, 1978. ✓
- b. Weld HBC-182-1-FW50 was re-examined by a qualified Peabody Technician and was found acceptable. The results of this report are documented on Peabody Testing Report PBT-PT-2325. X
- c. Approximately 50% of the liquid penetrant examinations in which the subject NDE technician performed or was an assistant were re-examined using the liquid penetrant method. All welds were found acceptable except one (1) which was rejected upon re-examination by another qualified Peabody technician. Evaluation of the rejectable area of the one weld indicated that it was a mechanically caused lap, 1/2" from the weld area. It was inconclusive whether the rejectable area was present at the time of the original liquid penetrant examination, since cleaning operations by craftsmen preceded the re-examination. Additional evaluation also indicates that in this instance, the incorrect technique would not have had an effect on the outcome of the examination, since a simple wipe, without the use of solvents, would not remove a sufficient quantity of dye to affect the appearance of an indication on the developer. Based on the number of welds re-examined and the resulting high ratio of acceptable to rejectable welds, those welds not re-examined are considered acceptable.

3. Corrective Action Taken to Prevent Recurrence

- a) The responsible Bechtel Quality Control Engineers have been instructed to increase surveillance activities with regard to liquid penetrant examination on all Peabody Testing Personnel. This increased surveillance will continue until the Lead Quality Control Welding Engineer is confident that Peabody Testing Personnel who are performing Liquid Penetrant Examinations are adhering to the approved NDE procedure.
- b) Bechtel Quality Control has added an inspection activity to the Quality Control Instruction for NDE Subcontractor Surveillance. This activity requires Bechtel to witness, for compliance with the approved NDE Procedure, the first examination by each individual technician for each method that a technician is qualified to perform. This will establish initial confidence in new Peabody Testing Personnel arriving on site.