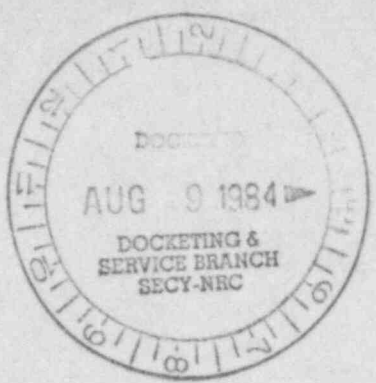


JMC

APPL. Ex. 105



REF: 59

OCT 31 1979

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

Subject: USNRC IF Region I Letter dated September 27, 1979
RE: Site Inspections of July 5, 6 and 9, 1979
Inspection Report No. 50-352/79-07 & 353/79-07
Limerick Generating Station - Units 1 and 2

File: → QUAL 1-2-2-1 (352/79-07)
QUAL 1-2-2-2 (353/79-07)

Dear Mr. Grier:

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,

95 10/29/79
R. J. L. 10/30/79
R. J. L. 10/29/79

RJL/gra
Attachment
bcc:

- R. H. Elias, Bechtel
- E. R. Klossin, Bechtel
- J. S. Kemper
- E. J. Bradley
- G. White
- E. C. Kistner
- H. R. Walters/Local File (2)
- J. J. Clarey
- R. A. Mulford
- J. M. Corcoran
- D. Marano
- R. H. Zong
- Project File (2)

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PDR ADDCK 05000352
G PDR

Attachment I

Response to Appendix A

Item of Noncompliance A

Infraction

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

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

Bechtel Power Corporation Project Special Provision Procedure G-6.1, Revision 2, states in Section 4.4, "Engineering changes which effect completed work that requires further construction, shall have a new inspection record initiated by construction QC. The new inspection record is developed to cover the inspection of the work required to accomplish the engineering change."

Contrary to the above, as of July 6, 1979, a Field Design Change Notice No. 5 to Design Drawing C-292 effected the completed and QC accepted weld joint on a pipe restraint, identified as PR-9. A new inspection record was not developed to cover the inspection of the work required to accomplish the engineering change. As a result, the work required by the engineering change was not accomplished on PR-9.

Response to Infraction A

Bechtel Quality Control inspected PR-9 and the nonconforming conditions were documented for Engineering disposition. Project Engineering dispositioned the nonconforming conditions by specifying a repair procedure that will meet specification and structural design requirements.

Subsequently, Quality Control re-inspected all restraints affected by Field Design Change Notice No. 5 to Dwg. C-292 and identified similar conditions on pipe restraint PR-45. The same repair procedure as above was specified by Project Engineering.

Repair work for both pipe restraints will be completed by November 16, 1979.

Development of corrective action to preclude recurrence is in progress and will be fully implemented by January 1, 1980.

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Item of Noncompliance B

Infraction

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

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

Bechtel Primary Containment Specification C2 (Revision 9), Section 10.1.14, applies to temporary brackets among other things, and states that: "Preheat at 200° F minimum shall be applied to all carbon steel seams whose thickness exceeds 1-1/4" regardless of ambient temperature."

Contrary to the above, as of July 6, 1979, temporary brackets were welded at several locations on the liner plate, where the plate thickness was 1-1/2 inches, and no preheat was applied.

Response to Infraction B

Weld documentation (WR-NC-1 Forms) has been reconstructed from existing Quality Control records of the subject welds to the containment liner plate. The documentation and control forms (WR-NC-1) have been fastened to the temporary attachments. For these temporary attachments WR-NC-1 requires a visual examination and a dye penetrant test of the affected base metal after the removal of the temporary attachments. This dye penetrant test will assure that any indications resulting from the lack of preheat will be discovered and dispositioned.

As a matter of interest, Weld Request (WR) Forms and Weld Filler Metal Authorization (WR-NC-2) Forms existed for the subject welds and show that the welding was performed by qualified welders.

Additionally, a letter of instruction was issued to require Quality Control Inspection/Records to be issued prior to performing temporary attachment welding to the containment liner. This will insure compliance with specified requirements such as preheat prior to welding.

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