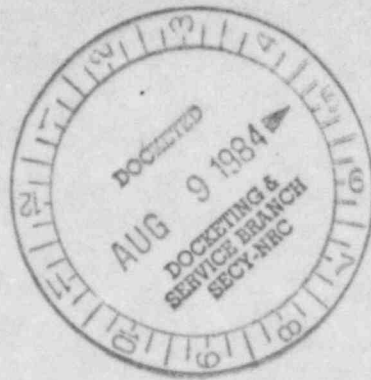


REF: 69



SEP 26 1980

Mr. Boyce Grier, 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 August 27, 1980
RE: Site and Office Inspection of June 16-27, 1980
Inspection Report No. 50-352/80-12 & 50-353/80-10
Limerick Generating Station - Units 1 and 2

File: QUAL 1-2-2 (352/80-12 and 353/80-10)

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,

J. S. Kemper
J. S. Kemper

*from 9/18/80
JNC/mnk
9/19/80*

Attachment

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

ATTACHMENT I

RESPONSE TO APPENDIX A

Item of Noncompliance - A

Deficiency

Appendix B of 10CFR50, Criterion V, states in part: "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 D.4.3.2 states in part: "The subcontractor shall have written procedures for control of the required testing and inspection programs on the item under contract. These procedures shall cover all nondestructive testing...".

Schneider Inc. procedure PPM 5.1 Revision 0 requires that Quality Control inspection personnel have experience and training and be certified as qualified prior to performing inspections.

Contrary to the above, on June 18, 1980 an individual who worked for Schneider Inc. as a QC inspector performed receipt inspections without being properly certified as a qualified inspector.

Response to Deficiency

Schneider Inc. upon identification of this deficiency immediately halted performance of inspections by this individual. All items previously inspected by this individual were re-inspected by a properly certified inspector. This re-inspection activity was reviewed and found to be complete on 8/19/80.

Schneider Inc. has revised their Project Procedure PPM 5.1, Certification and Training of QC Inspection Personnel, to include provisions to allow certification of Level I inspectors to three separate inspection categories after required training is accomplished.

Item of Noncompliance - B

Deficiency

Appendix B of 10CFR50, Criterion V, states in part: "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 Linerick PSAR, Appendix D, Quality Assurance Program, paragraph D.4.8 states, in part: "The subcontractor shall have instructions governing the control of measurements. These instructions shall include, as appropriate, calibration to standards and accuracy requirements...".

Schneider Inc. procedure PPM 3.8, Revision 5, states in part: "Low hydrogen type coated electrodes and stainless steel covered electrodes shall be stored in vented ovens at 250°F to 350°F. The ovens shall be checked quarterly using a calibrated thermometer...".

Contrary to the above, on June 20, 1980 oven number 1, which contained E7013 covered electrodes, was at a temperature in excess of the 350°F. Calibrated thermometers used for measuring oven temperature were apparently in error.

Response to Deficiency

Schneider Inc. issued Corrective Action Report #43 on 6/23/80 directing the defective thermometer to be removed from service and destroyed. Corrective Action was verified on CAR #43 and was closed on June 25, 1980.

New thermometers have been purchased, calibrated, and placed in service and the electrode oven's temperature has been reduced to within the acceptable range. Corrective actions were verified as being accomplished on 8/5/80.

The weld rod and welds made with this rod are acceptable and no effect on the safety and reliability of the welds is possible because the 400°F rod storage oven temperature (which was 50°F over the specified range of 250°F to 350°F) was not sufficient to break down the coating on the weld rod. This was confirmed during the NRC exit meeting for this inspection where the inspector stated, after consulting with weld rod manufacturers, that a 400°F storage temperature was not detrimental to the rod.

Item of Noncompliance - C

Deficiency

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

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

Bechtel Drawing C-602, Revision 21 in note 4, states in part: "construction joints shown on this drawing do not represent actual location. For actual construction joint locations, see ZC drawings".

Bechtel Job Rule JR-G-30 requires that each ZC drawing shall contain a note specifying the ultimate use of the drawing. If the drawing isn't to show the as-built conditions, then a note, "Installation shown on the drawing is not required to reflect the as-built condition" must be placed near the title block of the drawing.

Contrary to the above, as of June 18, 1980, drawing ZC-456, Revision 1, does not reflect the as-built location of the construction joint in the wall, nor does it have the required ultimate use note.

Response to Deficiency

ZC series drawings are used as "construction aid" drawings. They are not design drawings and do not show actual construction joint location.

Note 4 on drawing C-602 has been revised and now states: "Construction joints shown on this drawing do not represent actual location. Construction joints may be located as required by the Field, unless noted otherwise on the design drawings".

As required by Job Rule G-30, by December 31, 1980 a note will be placed on ZC drawings indicating that the drawing does not reflect the as-built condition.

Item of Noncompliance - D

Infraction

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

The Limerick PSAR, Appendix D, Quality Assurance Program, paragraph D.6.3 states in part: "Bechtel Power Corporation shall perform the quality assurance surveillance function to assure that equipment manufacture is in compliance with the applicable specification. Bechtel inspection carries out the surveillance function utilizing established guidelines and procedures..."

The Bechtel Nuclear Quality Assurance Manual Section III, procedure number 4, paragraph 3.1.7 states in part: "a release for shipment shall not be granted until all identified deficiencies and non-conformances are resolved, i.e. disposition verified or provisions made for subsequent resolution such as documented on a nonconformance report."

Contrary to the above, as of June 17, 1980, a weld repair had been made to the coped area of a safety related structural beam which had been delivered to the site. The weld did not meet the AWS-D.1.1 acceptance criteria. The suppliers quality documentation for this structural beam did not indicate that any weld repairs had been made.

Response to Infraction

Bechtel QC visually inspected the nonconforming beam and all other coped beams for platforms shown on drawing C-671 for elevations 225'-8 and 233'-10. Coped areas of eight of the beams including the NRC identified beam were nitral etched to determine if repair welds had been made. Radiographs taken where etching indicated weld repairs determined that several of the repairs including the repair identified by the NRC contained unacceptable weld defects. The inspection results are documented on NCR 4260 which was dispositioned use-as-is on September 3, 1980.

To prevent recurrence, the supplier was requested to improve the quality of weld repairs and has revised his In-Process Inspection Report to include a hold point inspection of beam cope repairs.

Corrective actions have been completed on or before September 26, 1980.

Item of Noncompliance - E

Infraction

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

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

Bechtel Job Rule M-3, Revision 5, in paragraph 4.0a states in part: "All (electrical and mechanical) equipment shall be installed in accordance with the job rule, the project specifications, the project engineering drawings, and engineering approved vendor drawings and installation instructions."

Contrary to the above, as of June 20, 1980, HVAC duct support No. 11 had been tack welded to the primary containemnt floor liner plate, although the Bechtel design drawing C-1411 did not specify welding to the liner plate. .

Response to Infraction

The unauthorized tack welds on the diaphragm slab of the containment liner were removed. After removal of the tack welds the affected area was examined, using non-destructive testing procedures, to assure that no unsatisfactory condition exists. Four of these tack welds existed on a single member.

The balance of the Unit 1 containment was visually inspected by both Schneider and Bechtel to ensure that no other unauthorized welds exist. This corrective action was completed on 8/27/80.

Schneider has instructed their foremen and welders that only ASME qualified welders are to work on the containment liner. This will preclude any unauthorized Schneider welding on the containment liner.

Item of Noncompliance - F

Deficiency

Appendix B of 10CFR50, Criterion V, states in part: "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 D.4.1, states in part "...Bechtel site subcontractors shall have a quality Control organization which has the authority and responsibility for seeing that the quality control program is established, planned and implemented..."

Paragraph 18.3.1.1 of Schneider's Quality Assurance Manual requires that each area of the QA Manual be audited once each year.

Contrary to the above, as of June 27, 1980, document control activities performed at the site were not audited during 1979.

Response to Deficiency

Schneider Inc. conducted a complete audit of the site document control activities (Section 6, "Document Control" of the Field QA Manual) on August 13, 1980.

To prevent recurrence of this situation, Schneider Inc.'s corporate office has established a formal audit schedule. Audits are scheduled several months prior to the required dates of the various QA Manual sections to ensure timely completion and maintain the specified audit frequency.