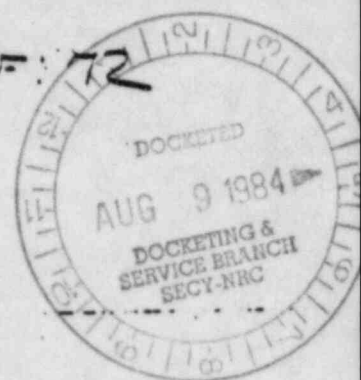


PHILADELPHIA ELECTRIC COMPANY

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PHILADELPHIA, PA. 19101

(215) 841-4500

REF: 72



V. S. BOYER
VICE-PRESIDENT

December 9, 1977

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: I Letter dated November 9, 1977
Re: Site Inspection of October 18-20, 1977
Inspection Report Nos. 50-352/77-12, 50-353/77-12
Limerick Generating Station, Units 1 & 2
File: QUAL 1-2-2-1 (77-12)
QUAL 1-2-2-2 (77-12)

Dear Mr. Grier:

In response to the subject letter regarding an item identified during the NRC visit to Limerick Generating Station - Units 1 & 2 on October 18-20, 1977 for inspection of construction activities authorized by NRC License Nos. CN32-106 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,

V. S. Boyer

Attachment:

- 1. P. P. [unclear]
- 2. P. P. [unclear]
- 3. P. P. [unclear]
- 4. P. P. [unclear]
- 5. P. P. [unclear]
- 6. P. P. [unclear]
- 7. P. P. [unclear]
- 8. P. P. [unclear]
- 9. P. P. [unclear]
- 10. P. P. [unclear]
- 11. P. P. [unclear]
- 12. P. P. [unclear]
- 13. P. P. [unclear]
- 14. P. P. [unclear]
- 15. P. P. [unclear]
- 16. P. P. [unclear]
- 17. P. P. [unclear]
- 18. P. P. [unclear]
- 19. P. P. [unclear]
- 20. P. P. [unclear]

ATTACHMENT I

Response to Notice of Violation

Deficiency

10 CFR 50, Appendix B, Criterion V, states, in part, that, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings..."

Paragraph D6.4 of the Quality Assurance Program documented in the USAR states, in part, that "Bechtel Construction Department. . . is responsible for construction of the plant to approved engineering specifications, drawings, and procedures. . ."

Bechtel Specification C-63, Revision 2, an approved engineering specification, states that field welding and inspection of structural steel shall be in accordance with requirements of the American Welding Society Structural Welding Code D1.1-72 with revisions 1-73 and 1-74. Part 6.5.1 of this Code states that all welds shall conform to the requirements of the Code and to the detail drawings.

Contrary to the above, as of October 18, 1977, structural welding, an activity affecting quality, was not performed in accordance with approved instructions, procedures, or drawings which resulted in the following nonconforming welds.

- a. Two upper bracket beam clip angles in Area 17 of Unit 2 were fastened to wall embeds with fillet welds the full thickness of the base metal which exceeded the requirement of Part 2.7.1.2(2) of AWS-D1.1 limiting these welds to 1/16 inch less than the base metal thickness.
- b. The upper bracket south brace in Area 17 of Unit 2 was attached to its gusset plate with a flare bevel weld at the rolled edge of the brace instead of 1/4 inch fillet weld as specified on Bechtel detail drawings No. C41A-291-4.
- c. Two lower support beam clip angles in Area 16 of the Unit 1 were fastened to wall embeds with 3/16 inch or less fillet welds instead of 3/8 inch fillet welds as specified on Bechtel detail drawing No. C41A-291-4.

Response

1. Corrective steps which have been taken and results achieved:

- a. All field welds on the four (4) RHR Heat exchanger support structures were reinspected and Bechtel NCR numbers 2970, 2971, 2972, and 2973 were issued identifying deficiencies found. It is anticipated that resolution of these findings will be accomplished by April 1, 1978.
- b. The welds in question were initially inspected by Bechtel QC engineers during the period October 2, 1975 to June 10, 1976. Since that period, a representative sample of inspections performed by the inspectors involved have been reinspected. No discrepancies were found.

2. Corrective steps taken to avoid further items of noncompliance:

- a. The Lead Quality Control Welding Engineer conducted a class on November 15, 1977 to re-instruct inspectors in their responsibility to verify compliance with specification and drawing requirements.