

APPENDIX A

NOTICE OF VIOLATION

Philadelphia Electric Company
Limerick Unit 1

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

As a result of the inspection conducted on June 25 - July 20, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), published in the Federal Register Notice (49 FR 8583) dated March 8, 1984, the following violations were identified:

- A. 10 CFR 50, Appendix B, Criterion IX, directs that nondestructive testing be accomplished in accordance with appropriate codes. The FSAR, invokes the ASME XI Code, 1974 through Winter 1975 Addenda. The ASME XI Code directs that calibration of ultrasonic examinations be accomplished in accordance with Article I-4000 calibration.

Contrary to the above, an NRC review of the ultrasonic preservice examination data and a letter (Reference Number 024-99) from Nuclear Energy Services, details an unacceptable method of calibration which is not in accordance with ASME Section XI I-4000. The method is currently being used by site NDE Level III personnel, who interpret and evaluate ASME XI Code ultrasonic reflectors for acceptability.

This is a Severity Level IV Violation (Supplement II).

- B. 10 CFR 50, Appendix B, Criterion XV, requires that nonconforming items be identified, reviewed and dispositioned in accordance with documented procedures. Site Quality Control program for controlling and documenting nonconforming items, SF/PSPG-3.1, Revision 11, dated January 13, 1984, Paragraph 3.1.5 requires that Nonconformance Reports be written when material is believed to be nonconforming.

Contrary to the above, an NRC review of preservice ultrasonic examination data on July 9-20, 1984, disclosed that Pipe Weld Nos. RHB-194, HP-117, RHB-005 max and RDB-011 were identified as containing rejectable weld indications but were not reported on nonconformance reports. These defects were not dispositioned in accordance with approved procedures.

This is a Severity Level IV Violation (Supplement II).

Pursuant to the provisions of 10 CFR 2.201, Philadelphia Electric Company is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

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PDR ADDCK 05000352
Q PDR

APPENDIX B

NOTICE OF DEVIATION

Philadelphia Electric Company
Limerick Unit 1

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

As a result of the inspection conducted on July 9-20, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register on March 8, 1984, (49 FR 8583), the following deviation was identified:

Final Safety Analysis Report (FSAR) Revision 27, dated December, 1983, Section 6, Paragraph 6.6 states, the preservice inspection program shall meet the requirements of the 1974 code, Section XI through the Summer 1975 Addenda, as modified by Appendix III of the Winter 1975 Addenda. Appendix III, Supplement 2, requires a reference system to be established to locate the weld center line for ultrasonic examinations.

Contrary to the above, there were no reference points established for the piping systems at Limerick Unit 1 to determine the weld center for the preservice ultrasonic examinations.

Philadelphia Electric Company is hereby requested to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) the corrective steps taken to avoid further deviations; and (3) the date when corrective action will be completed.

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