

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4502

JOHN S. KEMPER
VICE-PRESIDENT
ENGINEERING AND RESEARCH

OCT 31 1984

Mr. Thomas E. Murley, 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 letter dated October 4, 1984
Re: Site Inspection of June 25-July 20, 1984
Inspection Report No. 50-352/84-29
Limerick Generating Station, Unit 1
File: QUAL i-2-2 (352/84-29)

Dear Mr. Murley:

In response to the subject letter regarding items identified during the subject inspection of construction activities authorized by NRC License No. CPPR-106, we transmit herewith the following:

Attachment I - Response to Appendix A
Attachment II - Response to Appendix B

Should you have any question concerning these items, we would be pleased to discuss them with you.

Sincerely,

John S. Kemper
John S. Kemper

REC:am
Encl.

Copy to: Director of Inspection and Enforcement
United States Nuclear Regulatory Commission
Washington, DC 20555

S. K. Chaudhary, USNRC Resident Inspector

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ATTACHMENT I

VIOLATION A

10CFR50, Appendix B, Criterion IX, directs that nondestructive testing be accomplished in accordance with appropriate codes. The FSAR, Invokes the ASME XI Code, 1974 through Summer 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.

RESPONSE

Nuclear Energy Services has issued Revision 7 to the "Ultrasonic Examination General Requirements", procedure 80A1565, to require all Level III's to complete a calibration data sheet when the evaluation requires verification or additional data. Calibrations are performed in accordance with the above referenced procedure and the specific examination procedure, which complies with ASME Section XI.

Acceptability of previous Level III evaluations is documented on Nuclear Energy Services letter 5551-898a dated August 16, 1984. This letter documents a demonstration held for the Authorized Nuclear Inservice Inspector, Philadelphia Electric Company PIS Data Reviewers, and a representative from Bechtel M&QS. The demonstration showed repeatability and reliability of previous Level III evaluations.

All Nuclear Energy Services' Level III personnel have been instructed to observe and comply with the revised procedure. This instruction has been documented by NES on letter 024-241 dated August 15, 1984.

Full compliance of the corrective action was achieved August 22, 1984.

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ATTACHMENT I

VIOLATION 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.

RESPONSE

Philadelphia Electric Company has issued Nonconformance Reports numbered S866M, S867M, S868M, and S869M to document the reported indications on July 26, 1984. These NCR's have subsequently been dispositioned, required action completed and closed-out.

The above violation was a direct result of PLB-15,359 dated August 23, 1983, which contained guidance for writing nonconformance reports for rejectable indications found during Preservice Inspection. This letter has been withdrawn per the directions specified in Finding Report N-418, dated July 20, 1984. All Ultrasonic Test Data has been reviewed via the NES Supplemental Evaluation List of recordable indications and no additional rejectable indications exist which were not reported on nonconformance reports.

Full compliance was achieved on July 26, 1984.

ATTACHMENT II

DEVIATION

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.

RESPONSE

Nuclear Energy Services procedure 80A1557, Rev. 2, "Procedure for Weld Marking Datum Points and Identification" has been issued which details a mandatory method for identifying the weld centerline. Reference marks are to be stamped or vibro-etched on each side of the weld, outside of the examination area. The marks are placed in adjacent pairs, three inches from the toe of the weld, located in four areas 90° apart, around the circumference of the component. This method was previously an optional requirement in Revision 1 of the referenced procedure. This method has been implemented by NES since the summer of 1983 during system walkdowns and rescans. To date, in excess of 80% of the welds in the PSI Program Plan have been marked. The remaining welds will be marked during the ISI examination. The Inservice Inspection Plan which will be issued by October 1, 1985 will include this requirement. This commitment is being tracked by Philadelphia Electric Company's E&R QA Open Finding Report N-415.

Corrective action will be completed by October 1, 1985 with the issue of the Limerick Generating Station Inservice Inspection Program Plan.