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RELATED CORRESPONDENCE

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DOCKETED
USNRC

June 28, 1985

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Docket Nos. 50-3520L

50-353
OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Mr. Samuel J. Collins, Chief
Project Branch 2
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Collins:

Your letter of May 30, 1985 (S. J. Collins, USNRC, to S. L. Daltroff, PECO) forwarded a Technical Review Report prepared by Brookhaven National Laboratory (BNL) of the Automatic Depressurization System at Limerick Generating Station. In your letter you requested that we comment on the technique utilized (i.e., use of the Probabilistic Risk Assessment for system analysis) and provide information relative to the open items addressed in Section 12.1 of the enclosed report.

As stated in our responses to previous technical reviews performed by ENL on the Emergency Service Water System and the AC and DC Electric Power Systems (J. S. Kemper, PECO, to R. W. Starostecki, USNRC, November 7, 1984 and S. L. Daltroff, PECO, to R. W. Starostecki, USNRC, April 19, 1985), we believe that the use of the PRA Study provides for a sound technical basis and efficient review of those systems which are considered important to safety.

For clarity, the Section 12.1 items are restated below followed by our responses.

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Section 12.1 Open Items

1. Drawing Control: ADS drawings not posted with pertinent FDDR's and design changes; controlled drawing holders not properly following document control instructions; excessive design changes outstanding against GE drawings; and errors on sheet 3 of ADS logic drawing. (Section 11)

Response

The conditions noted in the report have been corrected. The 615 GE M-1 drawing revisions which were backlogged at Bechtel Construction, Inc. (BCI) have been reviewed and issued to the site. Document control at the site has distributed these revisions to all controlled M-1 "stick" files.

All of the "F" attachments (Field Deviation Disposition Requests (FDDR's), Field Change Requests (FCR's), and Field Disposition Instructions (FDI's)) on the controlled sticks of GE Unit 1 and common drawings were replaced with a correct set.

A spot audit was performed on twenty-five M-1 drawings by Philadelphia Electric Quality Assurance. The results of this audit were acceptable; revision levels and attachments listing outstanding FDDR's, and FCR's were correct.

FDDR's HH1-3427 and HH1-3431 have been issued to correct the errors noted in the GE ADS drawing. These FDDR's will be incorporated into drawing B21-1060-E-3.10, Revision 20.

These difficulties were the result of problems of the GE/BCI interface with control of drawing revisions. The attention brought by this review should correct the situation and prevent future recurrences.

2. ADS logic drawing (FSAR Fig. 7.3-8) is incorrect. (Section 10)

Response

FSAR logic drawing (Figure 7.3.8, Rev. 38) is being corrected and should appear in Rev. 44 to the FSAR which is currently scheduled for issuance in August, 1985.

Mr. Samuel J. Collins

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Should you have any questions or require further information, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. H. Kelly".

cc: Dr. W. R. Butler, USNRC
E. M. Kelly, Resident Site Inspector
See Attached Service List

cc: Judge Helen F. Hoyt
Judge Jerry Harbour
Judge Richard F. Cole
Troy B. Conner, Jr., Esq.
Ann P. Hodgdon, Esq.
Mr. Frank R. Romano
Mr. Robert L. Anthony
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Atomic Safety & Licensing Appeal Board
Atomic Safety & Licensing Board Panel
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James Wiggins
Timothy R. S. Campbell

June 12, 1985