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VICE-PRESIDENT
NUCLEAR ENGINEERING

FEB 19 1988

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: USNRC Region I Letter Dated January 8, 1988

RE: Site Inspection of November 16, 1987 to December
20, 1987 Inspection Report No. 50-353/87-16
Limerick Generating Station, Unit 2

File: QUAL 1-2-2 (353/87-16)

Gentlemen:

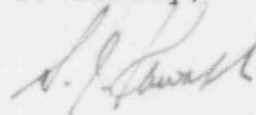
In response to the subject letter regarding the item identified during the subject inspection of construction activities authorized by NRC License No. CPPR-107, we transmit herewith the following:

Attachment I - Response to Appendix A

We appreciate the extension granted in a telecon on 2/10/88 between J. Linville - NRC and J. Corcoran - PECO, in order that Philadelphia Electric could forward a complete response.

Should you have any questions concerning this item, we would be pleased to discuss them with you.

Sincerely,



JMC/pc

Attachments

Copy to: United States Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

R. Gramm, USNRC Resident Inspector

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Attachment I

Response to Appendix A

As a result of the inspection conducted on November 16, 1987 to December 20, 1987, and in accordance with 10 CFR 2, Appendix C (Enforcement Policy 1987), the following violation was identified.

10 CFR 50, Appendix B, Criterion III requires that quality standards be specified in design documents. The Limerick Quality Assurance Program for Design and Construction section D.5.2 states that General Electric-NEBO is responsible to incorporate quality control provisions into drawings for equipment within the General Electric scope of supply. The General Electric Master Parts List 238X115AD identifies the recirculation pump motor as a passive safety related item that requires quality control inspection.

Contrary to the above, on November 20, 1987, General Electric Field Disposition Instruction 96-73030-1 had been issued which designated the motor seismic lug gusset reinforcement as non-safety related work and no quality control inspection was performed for the gusset installation.

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

Response:

As noted in the violation, the General Electric (GE) Master Parts List identifies the recirculation pump-motor combination as a passive safety related item necessary to maintain the pressure integrity of the recirculation system. GE has stated that both the actual classification and purchase requirements of the motor only are non-safety related. Although the motor was classified and purchased as non-safety related, the purchase specification required it to be designed and analyzed for seismic loads. Additionally, the motor was analyzed by GE as part of the NSSS Load Adequacy Evaluation Program and shown to be acceptable under all dynamic load inputs.

All snubbers that are attached to the recirculation pump motor are safety related and have been installed and inspected as such. The quality of the load path from the building steel through the snubbers and the motor housing to the pump has been "assured" by purchasing the motor in accordance with the GE APED QA program. The modification work that was performed on the motor seismic lugs under GE FDI-96-73030-1, correctly designated the work as non-safety related and required additional QA monitoring of the work. These additional controls were incorporated to be consistent

with the provisions of ASME Code Section III, Article NF-1000, Paragraph NF-1110(C), which states:

"intervening elements in the component support load path," such as "electric motors" need not be "constructed to the rules of this Section", although the adequacy of these intervening elements must be assured by the Owner.

To verify that all safety related aspects of the recirculation pump motor were adequately inspected, all records and procedures associated with the motor seismic lug gussets are being reviewed by Quality Control. Additional rework or inspections will be performed as needed to ensure the structural integrity of the attachments to the motor. In addition, to verify that other passive safety related inspections were not omitted, all GE FDI's/Field Deviation Disposition Requests (FDDRs) for passive safety equipment are being reviewed. Because the number of FDI's/FDDRs involved, this task is still underway. We expect both reviews to be completed by June 30, 1988.