

3881005050

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4500

JOHN S. KEMPER  
SENIOR VICE-PRESIDENT - NUCLEAR

6-24-88

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

Subject: USNRC Region I Letter Dated May 25, 1988

RE: Site Inspection of April 25 to May 3, 1988  
Inspection Report No. 50-353/88-12 Limerick  
Generating Station, Unit 2

File: QUAL 1-2-2 (353/88-12)

Gentlemen:

In response to the subject letter regarding the items 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

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

Sincerely,

*John S. Kemper*

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

8807080162 880624  
PDR ADOCK 05000353  
PDC

*LEO*  
*1/1*

Attachment IResponse to Appendix AViolation

As a result of the inspection conducted during the period of April 25 through May 3, 1988 and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR 2, Appendix C (Enforcement Policy 1988) the following violation was identified.

10 CFR 50, Appendix B, Section V states that "...Activities affecting quality shall be prescribed by documented instruction, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Contrary to the above, on April 25, 1988 licensee personnel were observed surfacing (lapping) the "D" emergency diesel generator crankshaft main and connecting rod bearing journals without documented instructions to establish proper lapping material, lapping procedures, and acceptance criteria. As a consequence newly installed bearings were found with substantial residual contaminating abrasive lapping compound left in the bearings.

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

Response:

We are in the process of obtaining instructions from the Diesel Generator manufacturer, Colt Industries, for performing surfacing (lapping) of crankshaft main and connecting rod bearing journals. This information will be included in the appropriate procedures.

This information will include detailed instructions for the proper methods, materials and acceptance criteria to be used during the lapping process for both the Unit 1 and Unit 2 Emergency Diesel Generators.

In response to the violation, the contaminated bearings have been disassembled, recleaned, and inspected. The Unit 2 personnel involved have been given training in the proper methods to be used during the lapping process. Acceptance criteria for residual

lapping compound has been established and incorporated into the Colt Industries Maintenance Manual.

In addition, Unit 1 has been evaluated for this condition and was found to be exempt. No lapping has been performed to date. Future lapping will be performed in accordance with the revised procedure.

We expect all the action to be completed by December, 1988. We expect no lapping of Diesel Generator bearings prior to that date.