

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4500

JOHN S. KEMPER
SENIOR VICE-PRESIDENT - NUCLEAR

April 20, 1988

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

Subject: USNRC Region I Letter Dated March 21, 1988

RE: Site Inspection of January 11, 1988 to January 15,
1988 Inspection Report No. 50-353/88-01 Limerick
Generating Station, Unit 2

File: QUAL 1-2-2 (353/88-01)

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,



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

8804280371 880420
PDR ADOCK 05000353
Q DCD

IE01
11

Attachment I

Response to Appendix A

Violation

As a result of the inspection conducted on January 11-15, 1988, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR 2, Appendix C (Enforcement Policy) (1986), the following violation was identified.

10 CFR 50, Appendix B, Criterion III states in part that "...Activities affecting quality shall be accomplished under suitably controlled conditions. Controlled conditions include...suitable environmental conditions for accomplishing the activities....The program shall provide indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained...."

Limerick Construction Procedure CP-E-2 paragraph 5.2.3.25, Revision 2, and CP-F-2, paragraph 5.5.1.3, Revision 4, require that special handling techniques be employed for cables when temperatures are below 10 degrees.

Contrary to the above, on January 11, 1988, adequate controls for handling cables below 10 degrees were not implemented in that the personnel performing these activities were not aware of the temperature limitations as evidenced during interviews.

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

Response:

As noted in the violation, cable was handled and cut when its temperature was below 10F. This incident occurred in our outdoor cable storage area.

Cable handling restrictions were placed in the construction procedures to ensure that the cable was not damaged in cold weather. The 10F limitation was very conservatively established. It is well above the manufacturers cold bend test of -40F. Since the ambient temperature of -40F envelops the temperatures at Limerick, these design restrictions need not be listed in the work procedures. As a result of the vendor's test results, we concluded the cable handled at temperatures below 10F and above -40F was not damaged during the handling on January 11, 1988.

Bechtel Construction Procedure CP-G-2 provides the orientation and training of our non manual personnel. This procedure establishes the responsibility for each individual's supervision to ensure that he receives the needed training to perform his assignments. Each employee must complete his assigned indoctrination prior to beginning his activities. CP-G-2 also establishes the requirements for formal and informal training provided at Limerick when required.

Personnel responsible for performing cable pulls at Limerick had been trained on the cable handling restrictions at low temperatures. Inadvertently, the personnel responsible for cutting the cable were missed in the training. To prevent a recurrence, we have now trained the responsible personnel for cable handling in the revised requirements. Also in order to prevent recurrence, we will ensure the appropriate personnel are appraised of the procedural requirement changes when they occur in accordance with the orientation and training procedures. Our audit program has also been modified to ensure the retraining program continues to be effective.