



**Duquesne Light**

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October 5, 1979

United States Nuclear Regulatory Commission  
Attention: Mr. Eldon J. Brunner, Chief  
Reactor Operations and Nuclear  
Support Branch

Region I  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Reference: Beaver Valley Power Station, Unit No. 1  
Docket No. 50-334  
License No. DPR-66  
IE Inspection Report No. 79-13

Dear Mr. Brunner:

In response to your letter of September 12, 1979 and in accordance with 10 CFR 2.201, the attached reply addresses the Notice of Violation which was included as Appendix A of the referenced Inspection Report. The noted violation was the inadequate implementation of design control measures.

If you have any questions concerning this response, please contact my office.

Very truly yours,

*C. N. Dunn* RAI

C. N. Dunn  
Vice President, Operations

Attachment

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DUQUESNE LIGHT COMPANY  
Beaver Valley Power Station  
Unit No. 1

REPLY TO NOTICE OF VIOLATION  
Inspection No. 79-13  
Letter Dated September 12, 1979

Description Of Infraction (79-13-01)

10 CFR 50 Appendix B, Criteria III, states, in part, "Measures shall be established for the identification and control of design interfaces and for coordination among participating design organizations. Design changes, including field changes, shall be subject to design control measures commensurate with those applied to the original design...."

The Beaver Valley FSAR, Appendix A, Quality Assurance Program, Paragraph A.2.2.3 Design Control states, in part, that: "The design control measures applied to design changes includes provisions for the selection and review for suitability of the application of materials, parts/equipment, and processes that are essential to the safety related functions of structures, systems, and components." Beaver Valley Quality Assurance Procedure No. OP-4, Revision 5, Stations Design Control, Paragraph 4.3.4 states, in part, that: "A design concept is developed by the design group as part of the planning process. This concept provides the framework within which the design change is implemented, and includes as a minimum....(5) an index of required design and installation documents and procurement specifications."

Contrary to the above, on November 9, 1978, Engineering Memorandum No. 20121 was approved, authorizing installation of a temporary local monitoring circuit in the Emergency Diesel Generator control panels for the purpose of monitoring relay operation. The type of material and method of mounting this component within the subject panel was not specified, evaluated, or documented by appropriate engineering personnel nor were installation document and material specifications prepared.

Discussion Of Infraction

The installation of the temporary local monitoring circuit was reviewed and authorized by the Onsite Safety Committee (OSC). Since this is not a permanent change, an in-depth review, as required for permanent design changes, is not necessary.

Corrective Action

The temporary test circuit was re-mounted on fire-proof material and the installation was supervised and reviewed for secure mounting by the assigned engineer.

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Action Taken To Prevent Recurrence

Temporary test installations required to provide information necessary for engineering evaluation, design verification, troubleshooting or similar purposes will be more closely reviewed by the OSC to assure adequate evaluation and engineering review prior to installation.

Date On Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.

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