

U. S. NUCLEAR REGULATORY COMMISSION  
OFFICE OF INSPECTION AND ENFORCEMENT

Region I

Report No. 50-334/79-21

Docket No. 50-334

License No. DPR-66

Priority --

Category C

Licensee: Duquesne Light Company

435 Sixth Avenue

Pittsburgh, Pennsylvania 15219

Facility Name: Beaver Valley Power Station, Unit 1

Meeting at: USNRC, Region I, King of Prussia, Pennsylvania

Meeting conducted: September 25, 1979

Inspector: *D. A. Beckman*  
D. A. Beckman, Reactor Inspector

*10/15/79*  
date signed

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Approved by: *E. C. McCall, Jr., Sr*  
R. R. Keimig, Chief, Reactor Projects  
Section No. 1, RO&NS Branch

*10/19/79*  
date signed

Meeting Summary:

Enforcement Conference on September 25, 1979 (Report No. 50-334/79-21)

Summary: Special enforcement conference convened by Region I management to discuss NRC concerns regarding licensee implementation of the design control program, the effectiveness of licensee management controls, and the facility's recent enforcement history. The meeting was attended by senior licensee and Region I management and involved 2 hours in the Region I office by all attendees.

## DETAILS

### 1. Attendees

#### Duquesne Light Company

J. Carey, Technical Assistant - Nuclear  
C. Dunn, Vice President, Operations Division  
G. Moore, General Superintendent, Power Stations Department  
R. Swiderski, Superintendent of Construction, BVPS  
H. Van Wassen, Project Manager, BVPS  
R. Washabaugh, Manager of Quality Assurance  
J. Werling, Superintendent, BVPS  
E. Woolever, Vice President, Engineering and Construction Division

#### U. S. Nuclear Regulatory Commission

B. Grier, Director, Region I  
J. Allan, Deputy Director, Region I  
D. Beckman, Reactor Inspector, Reactor Operations and Nuclear Support Branch, Region I  
E. Brunner, Chief, Reactor Operations and Nuclear Support Branch, Region I  
R. Keimig, Chief, Reactor Projects Section No. 1, Reactor Operations and Nuclear Support Branch, Region I  
H. Kister, Chief, Nuclear Support Section No. 2, Reactor Operations and Nuclear Support Branch, Region I

### 2. Meeting Summary

Opening remarks made by regional management summarized the concerns further described below and included a discussion of the need to communicate these concerns directly to the senior licensee management present. The purpose of the meeting was characterized as preventive enforcement based on the results of recent inspections, NRC review of licensee communications, and the facility's recent enforcement history. The goal of the meeting was stated to be the projection of NRC concerns to licensee management to permit additional licensee attention to be focused on the concerns.

a. Design Control Program

NRC:RI inspection experiences with the licensee's program for the control of design changes and modifications were discussed on the basis of the previous eighteen months of inspection. A brief history of NRC inspection findings and observations was presented to the licensee. This history emphasized the apparent difficulty experienced by the licensee in implementing the design control program and associated corrective actions and commitments which have resulted from NRC inspections and Duquesne Light Company internal quality assurance audits between March 1978 and the present. The licensee's design control program activities were most recently inspected during August 1979 (IE Inspection Report No. 50-334/79-18) during which NRC:RI identified several items of noncompliance and incomplete commitments. As a result of these inspection findings, the licensee's meeting representatives were informed of the NRC's concern for the need for improvement in the conduct of plant design changes and modifications within the provisions of the facility's operating license.

These concerns included:

- The need to evaluate completed design change packages which were not accomplished in accordance with design control program requirements to ensure that safety related issues were adequately addressed;
- The need to promptly update design documents affected by previously accomplished design changes to reflect the as-built condition of the plant;
- The need to complete organization and program changes to ensure adequate support of future design change engineering and implementation, particularly with regard to those activities scheduled for performance during the November 1979 outage;
- The need to ensure that design change activities are conducted by designated and trained personnel only; and,
- The need to better administer commitments made to NRC in writing in response to previous NRC inspection findings.

The licensee was informed that, as part of the correspondence with IE Inspection No. 50-334/79-18, NRC:RI will request Duquesne Light Company to make specific commitments for improvements in the management of the design control program to provide assurance that previously completed design change work presents no reduction in plant safety and that design changes to be implemented during the upcoming outage will be performed in accordance with the requirements of the facility's operating license.

The licensee acknowledged the above stated concerns and provided the following comments in response: that an effort is currently underway to review and update drawings affected by previously implemented design changes to ensure that a firm data base is available for future design changes; that for the upcoming outage, all design change activities will be conducted by the Engineering and Construction Division (E&CD) in accordance with the latest of the Engineering Management Procedures; that no design change work will be accomplished by station personnel; that new workforce of E&CD personnel has been established at the station as an extension of the corporate office engineering staff thus eliminating the need for involvement of station engineering personnel in design change engineering; that manning of this organization is currently underway and will be supplemented by engineers provided by the licensee's architect-engineer during the outage; and that this onsite engineering group will function to coordinate field activities with the corporate office and will provide expeditious field support for outage activities.

The licensee and Region I attendees also discussed recently completed design control program training for engineering personnel, licensee plans for quality assurance audits and surveillances of outage design control activities and, avoidance of previously experienced difficulties with regard to station performed design change engineering. The licensee was responsive to the NRC comments and indicated that the problems discussed are being actively pursued with the direct attention of senior corporate management.

b. Management Controls and Enforcement History

As a result of NRC:RI experience with the licensee's programs concerning recent technical issues, correspondence associated with IE Bulletins and information requests, and observations or findings made during inspections, the meeting discussion included the efficacy of the licensee's management and administrative controls. The following areas of concern were presented by Region I and discussed with the licensee:

- Additional emphasis appears necessary to ensure that management is available to provide the necessary focus for resolution of technical and regulatory matters identified internally or by the NRC. Communications with licensee plant and corporate personnel appear to have suffered a loss of effectiveness during the recent past. Additional management attention appears to be necessary early in the development of safety issues or technical problems to assure responsiveness and prompt resolution to preclude unnecessary and additional iteration and manpower expenditure. NRC:RI acknowledged the extraordinarily high management and engineering burdens placed upon the licensee through the last year by major issues but expressed the need to effectively address safety issues under all circumstances.
- Recent NRC experience with licensee submittals has indicated a need for improvement in document completeness and depth of detailed engineering evaluation. In some recent cases, increased NRC attention has been required to obtain the information necessary for NRC evaluation. Examples include IE Bulletin responses, licensee correspondence on technical matters or safety issues, and licensee exceptions to generic NRC positions.
- Recent inspection experience has resulted in concerns regarding the licensee's administration of commitments made to the NRC and control of licensee internal commitments which are necessary to support licensed activities. These concerns include the need for additional management emphasis on the tracking of commitment status, escalation of identified problems to appropriate levels of management, review of commitment actions for completeness and adequacy prior to presentation to NRC, and timeliness of completion for committed actions. Recent NRC experience also indicates that additional coordination appears necessary between the various DLC divisions and departments which must interface to implement commitment actions.
- NRC:RI inspections and observations of the licensee's implementation of programs required by license conditions have indicated that marginally acceptable progress has been made in several key programs such as in-service testing of pumps and valves, 10 CFR 50 Appendix J Leak Rate Testing, snubber and pipe support surveillance, and emergency planning. Program inspections in these and other similar areas have been essentially preventive in nature with numerous findings which address the need for program improvement or refinement. The apparent difficulties observed include a need to more

effectively address these inspection findings, a need for improvement in developing priorities and tracking of identified program problems or weaknesses, and a need to escalate identified problems to appropriate levels of management to assist in resolution.

- During the past year, the plant has experienced periods of extended shutdown. During that time, NRC observations and findings appear to indicate a trend toward relaxation of plant operating personnel adherence to administrative controls as evidenced by an increasing latitude observed in procedure interpretation and adherence. Recent inspections have identified noncompliances which have had the potential to result in actual occurrences. In several cases, the licensee's quality assurance program provided a possible mechanism for permitting the identified deviations of procedure based on the performance of appropriate evaluations but no such option was exercised.
- The general trend of the past several years' NRC enforcement history appears to indicate a continuing problem with the successful implementation of administrative controls and technical programs. Additionally, the number of inspection findings (unresolved items) which are cited as noncompliance has not decreased. These items do not appear to be receiving the attention necessary to adequately resolve them before they constitute noncompliance and thus, result in a greater potential for continuing, future noncompliance.

The licensee representatives acknowledged the above comments and stated that the matters would be taken under serious advisement. The licensee further acknowledged that the past year's plant experience has severely impacted their available resources and is atypical of normal industry experience. NRC:RI informed the licensee that the matters discussed above would be presented in a report of the meeting and would be accompanied by a request for licensee comments and commitments for improvements in the respective areas.

In closing, the licensee stated an intention to improve performance in the areas discussed above. While considering their past performance to be adequate with respect to meeting the conditions of their NRC facility license, the licensee stated that improvement in all areas will be made.