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Duquesne Light

435 Sixth Avenue
Pittsburgh, Pa.
15219

(412) 456-8000

February 29, 1980

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Attn: Boyce H. Grier, Regional Director
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
Interim Report on IE Bulletin 79-14

Dear Mr. Grier:

As a result of a commitment to the NRC Resident Inspector associated with Inspection Report 79-27, this submittal is made to clarify Duquesne Light Company actions and plans with regard to IE Bulletin 79-14.

As has been stated in previous correspondence and discussions, Duquesne Light Company's current effort is directed toward completing inspection of all piping not previously inspected and subject to the Bulletin in full compliance with the requirements of the Bulletin.

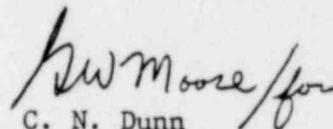
Prior to issuance of the Bulletin, verification of the accuracy of "as built" drawings of the Containment Annulus and Cable Vault CVRK Racks were undertaken in response to the March 13, 1979, show cause order. Since this verification effort preceded the issuance of the Bulletin, NRC inspection criteria were not available. However, informal but detailed instructions were developed by Stone and Webster and were provided to those personnel making the inspection.

The results of the drawing verification effort are being compared against the basis of the seismic reanalysis by experienced pipe stress and supports engineers familiar with the work to date. These engineers assess the impact of noted deviations between the "as built" condition and the "as analyzed" condition. When significant deviations arise as a result of this review, the problem is recoded into NUPIPE using the configuration on the field walked isometric, and reanalyzed.

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The results to date have indicated very good correspondence between the original "as built" drawings and the as installed systems. We plan to continue to evaluate the results of the current Duquesne "as built" inspection program. If the evaluation of the current "as built" inspection program continues to indicate satisfactory conformance between the "as built" and "as analyzed" conditions, then we will consider that the entire "as built" drawing verification program is satisfactory. However, if the current inspection program does not yield satisfactory results, the CVRK and Annulus Racks will be reinspected.

Very truly yours,

A handwritten signature in cursive script, appearing to read "C. N. Dunn for".

C. N. Dunn
Vice President, Operations