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March 25, 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  
IE Inspection No. 80-02

Dear Mr. Grier:

In response to your letter dated February 26, 1980, 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 failure to review and approve a liquid penetrant procedure prior to use in accordance with the Technical Specifications.

We have reviewed the referenced report for information subject to claim from withholding from disclosure under 10 CFR 2.790 and no such information was identified.

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

Very truly yours,

C. N. Dunn  
Vice President, Operations

Attachment

DUQUESNE LIGHT COMPANY  
Beaver Valley Power Station  
Unit No. 1

Reply to Notice of Violation  
Inspection 80-02  
Letter Dated February 26, 1980

Description of Infraction

The Beaver Valley Unit 1 technical specification 6.8.1 states, in part, that "Written procedures shall be established,...covering the activities referenced below: a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972..."

Regulatory Guide 1.33, November 1972, Appendix "A", Section H.2, states, in part, that "Specific procedures for inspections...should be written..."

Appendix "A", Section H.2.a(20), of Regulatory Guide 1.33, November 1972, addresses inspection of reactor coolant system pressure boundary.

Technical Specification 6.8.2 states, in part, that "Each procedure...of 6.8.1 above...shall be reviewed by the OSC and approved by the Plant Superintendent prior to implementation..."

Contrary to the above, during the period from December 31, 1979, to January 7, 1980, liquid penetrant procedure PT-10, Revision 1, which was neither reviewed by the OSC nor approved by the Plant Superintendent, was used for the penetrant examination of weld 16 DM loop 2 cold leg nozzle to safe-end field weld 24.

Discussion of Infraction

We have reviewed the requirements of our Technical Specifications and are of the opinion that liquid penetrant procedure PT-10, Revision 1, is not part of our Inservice Inspection Program and therefore does not require review by the OSC and approval by the Station Superintendent. The basis for this conclusion is as follows:

Indications were observed on the nozzle safe end weld by the contractor performing the ISI inspections. The dispositioning of these indications was forwarded to the Duquesne Light Company Engineering and Construction Division. In order to be able to clearly define the extent of the indications for the purpose of evaluation, the Engineering and Construction Division performed procedure PT-10, a LP procedure approved for use on Unit 2. Based on the results of the procedure, the Engineering and Construction Division was able to determine the necessary corrective actions which was polishing and light grinding. PT-10 was reperformed as necessary to determine the adequacy of the corrective action. Based on these results, engineering was able to disposition the indications as acceptable in accordance with the ASME codes.

Discussion of Infraction (continued)

The ISI contractor has been scheduled to return to reperform the LP on the safe end weld, which will be the final inspection of record in accordance with our ISI program. We do not believe that procedures performed to support engineering evaluations fall under the Beaver Valley Power Station Technical Specifications for review and approval. In addition, LP procedure PT-10 is used in our Beaver Valley Power Station Unit No. 2 construction program and has been reviewed and approved for use in accordance with the Duquesne Light Company Quality Assurance Program.

Corrective Action

None Required.

Action Taken to Prevent Recurrence

The station will review and revise as necessary the station administrative controls to more clearly define the reviews and approval of procedures as required by our Technical Specifications.

Date on Which Full Compliance Will Be Achieved

June 1, 1980.