

Duquesne Light Company

Beaver Valley Power Station
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JOHN D. SIEBER
Vice President - Nuclear Group

1412 643-6265

October 18, 1989

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

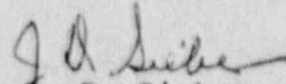
Reference: Beaver Valley Power Station, Unit No. 1 and No. 2
BV-1 Docket No. 50-334, License No. DPR-66
BV-2 Docket No. 50-412, License No. NPF-73
Combined Inspection Report 50-334/89-12 and 50-412/89-13

Gentlemen:

On September 11, 1989 we submitted a reply to the Notice of violation which was included with the referenced inspection report. Our reply to Violation A stated that a status of actions taken and a schedule for remaining actions would be submitted at a later date.

Enclosed is our updated response. If there are any questions concerning this response, please contact my office.

Very truly yours,


J. D. Sieber
Vice President
Nuclear Group

Attachment

cc: Mr. J. Beall, Sr. Resident Inspector
Mr. W. T. Russell, NRC Region I Administrator
Mr. Edward C. Wenzinger, Chief Reactor Projects Branch No. 4,
Division of Reactor Projects, Region I
Director, Safety Evaluation & Control (VEPCO)

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DUQUESNE LIGHT COMPANY
Nuclear Group
Beaver Valley Power Station Units 1 & 2

Status of Actions
Cable Separation Violation

Initial Reply to Violation:

Description of Violation (50-334/89-12-01)

10 CFR Part 50, Appendix B, Criterion XVI requires that measures shall be established to assure that for conditions adverse to quality, the cause of the condition is determined and corrective action is taken to preclude repetition.

Contrary to the above, the licensee's corrective actions in response to findings identified by NRC in Inspection Report 88-22, Detail 10, regarding inadequate separation of safety related electrical cable were not adequate. Several similar discrepancies were identified by NRC on July 7, 1989. Adequate cable separation still does not exist in the Unit 1 Cable Mezzanine.

Discussion of Violation

As a result of the instances of inadequate separation of safety related cables identified by the NRC in Inspection Report 50-334/88-22, Duquesne Light conducted inspections of all accessible BV-1 areas for cable separation deficiencies. These inspections were broad in scope and were conducted on an area basis.

Following the recently identified discrepancies, we conducted a root cause analysis of the cable separation problem. This review of our inspection plan indicated that the inspection by area rather than by component was not adequate to identify all potential deficiencies. In order to correct this, a more systematic inspection plan to resolving this problem was recommended.

Corrective Action Taken

A comprehensive plan was developed and implemented within 24 hours of the NRC identification of the discrepancies. This plan provides for a systematic approach for inspecting Category 1E cables and raceways in Unit 1 to assure that installations will meet the original installation criteria and that identified deficiencies will be appropriately resolved. The four color separation concerns identified by the NRC on July 7, 1989 were resolved. At present, walkdown teams continue to perform color separation inspections while a resolution team is concurrently determining the appropriate corrective action to be taken for each deficiency.

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Action Taken to Prevent Recurrence

The cable color separation deficiencies identified as the result of the new inspection program are associated with cables which appear to have been installed during the construction phase of Unit 1 or during early design change installations. The present day practice of 100% Quality Control (QC) inspection for Category 1E cables provides assurance that all new 1E installations will meet the installation criteria. In addition, we will incorporate into our process installation standards the requirement for all future non-1E cable installations to be inspected by QC to confirm installation separation criteria are met.

Date of Full Compliance

Walkdowns and evaluations are still continuing, therefore, we have not determined a completion schedule at this time for inspections and corrective actions in all areas. Since Unit 1 is currently shut down for refueling, we will complete the inspections and correction of any deficiencies within the Unit 1 containment prior to startup.

The process installation standard for inspection of non-1E cable installations will be revised by October 2, 1989.

We will provide a status and schedule for completion of the remaining corrective actions by October 18, 1989.

October 18, 1989 Status of Actions

Implementation of the comprehensive plan for inspecting Category 1E cables and raceways at Unit 1, as described in our original response, is continuing at this time. To date, in excess of 15,000 man-hours have been expended in this effort.

For Unit 1 containment inspections, approximately 98 percent of the walkdowns and evaluations have been completed in accordance with the plan. We intend to complete the remaining inspections and correct any cable separation deficiencies within the Unit 1 containment prior to startup from the current refueling outage.

For inspections outside of containment, approximately 20 percent of the Category 1E cable raceways have been inspected to date. These inspections have been scheduled to give priority to high energy cables and high density raceways.

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Approximately 80 percent of the Category 1E high energy cable raceways have been inspected. We anticipate completing the walkdowns of the remaining high energy cable raceways prior to startup from the current outage. Any remaining deficiencies resulting from these inspections will be evaluated prior to startup and a justification for continued operation (JCO) will be developed, where necessary.

The remainder of the Category 1E raceway walkdowns will be complete by January 31, 1990. We will provide you with a final schedule for resolution of any remaining deficiencies by February 15, 1990.

The process installation standard for inspection of non-1E cable installations was revised by October 2, 1989 to require all future non-1E cable installations to be inspected by QC to confirm installation separation criteria are met.