Duquesne Light
435 Sixth Avenue
Pittsburgh, Pa.
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(412) 456-6000

DUQUESNE LIGHT COMPANY
Beaver Valley Power Station
Post Office Box 4
Shippingport, PA 15077

March 26, 1981
BVPS:JAW:1134

Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66
LER 81-29/01P

Mr. B. H. Grier, Director of Regulation
United States Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Grier:

In accordance with Appendix A, Beaver Valley Technical Specifications, Licensee Event Report LER 81-29/01P, Technical Specification 4.0.5, Inservice Inspection Program, is submitted. This occurrence was reported to the Beaver Valley Resident Inspector, Mr. D. A. Beckman, at 1100 hours on March 25, 1981.

On March 12, 1981, the Duquesne Light Company Nuclear Services Quality Control (NSQC), while performing a review of the Inservice Inspection (ISI) requirements for modifications recently completed on a 3/4" and 1" branch connection on the Reactor Coolant System and Safety Injection System, respectively, noted a discrepancy between the Plant Modification Manual (PMM) and the Technical Specifications. The hydrostatic test requirements of the PMM referenced the 1977 edition through the 1978 summer addenda of ASME XI, while the Technical Specifications require hydrostatic testing be performed to the 1974 edition through the 1975 summer addenda of ASME XI. NSQC requested that DLCo Engineering evaluate the noted discrepancy.

Duquesne Light Company Engineering informed the station that the application of the PMM resulted in the following two differences between the two editions of the Code.

1) Branch connections 1" or less are exempted from hydrostatic testing after repair or modification. These lines are not exempted from hydrostatic testing under the edition of the code required by the Technical Specifications.

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2) A hydrostatic test time of ten (10) minutes for exposed areas was permissible under the Code subsection IWA-5210 referenced in the PMM. A test time of four (4) hours for all areas exposed or unexposed, is required under the subsection of the Code endorsed by the Technical Specifications.

Item (1) was applied to the hydrostatic testing requirements of the two branch connection modifications performed during the current plant shutdown. Item (2) was applied to the modifications completed during the refueling and modification outage from December 1, 1979 through November 22, 1980.

The discrepancy resulted when the PMM was prepared and the requirements of 10 CFR 50.55a(g)(4)(i) were misinterpreted. The use of the two applications is technically justified in that: Item (1) was presented as Code Case N-210 and was approved by the ASME Council on March 20, 1978 and was subsequently incorporated in the 1978 summer addenda of the 1977 edition of ASME XI. Code Case N-210 was also endorsed in Regulatory Guide 1.147 issued by the NRC in February, 1981. Item (2) was incorporated in the 1975 winter addenda of the 1974 edition of ASME XI and subsequently in the 1977 edition of ASME XI. The 1977 edition through the 1978 summer addenda of ASME XI has been endorsed by 10 CFR 50.55a(b). There are no potential safety effects resulting from the use of the two applications.

Originally, relief was granted from Subsection IWA-5210 paragraph (a) via the Reactor Coolant System Technical Specification bases, which stated: "Repairs on components 2 inches in diameter or smaller receive a surface examination which assures a similar standard of integrity" and "...a leak test will ensure leak tightness during normal operation".

The failure to obtain an exemption from Subsection IWA-5210 paragraph (a) and permission to invoke Code Case N-210 prior to applying their specific use in the Beaver Valley Power Station ISI program is a violation of Technical Specification 4.05, Limiting Condition for Operation related to Inservice Inspection.

Very truly yours,

J. A. Werling
Superintendent

cc: Director Of Management & Program Analysis
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Director, Office of Inspection and Enforcement Headquarters ✓
United States Nuclear Regulatory Commission
Washington, D. C. 20555

D. A. Chaney, BVPS Licensing Project Manager
United States Nuclear Regulatory Commission
Washington, D. C. 20555

D. A. Beckman, Nuclear Regulatory Commission, BVPS Site Inspector

Nuclear Safety Analysis Center, Palo Alto, California

G. E. Muckle, Factory Mutual Engineering, Pittsburgh

Mr. John Alford, PA Public Utilities Commission, Harrisburg, PA

NRC FORM 366
(7-77) *

U. S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT

CONTROL BLOCK: (1) (PLEASE PRINT OR TYPE ALL REQUIRED INFORMATION)

0 1 | (2) LICENSEE CODE | (3) LICENSE NUMBER | (4) LICENSE TYPE | (5) CAT

CON'T

0 1 | REPORT SOURCE (6) | 0 5 0 0 0 3 3 4 (7) | 0 3 1 2 8 1 (8) | 0 3 2 6 8 1 (9)

(6) REPORT SOURCE | (7) DOCKET NUMBER | (8) EVENT DATE | (9) REPORT DATE

EVENT DESCRIPTION AND PROBABLE CONSEQUENCES (10)

0 2

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0 9 | (11) SYSTEM CODE | (12) CAUSE CODE | (13) CAUSE SUBCODE | (14) COMPONENT CODE | (15) COMP. SUBCODE | (16) VALVE SUBCODE

(17) LER/RO REPORT NUMBER | EVENT YEAR 8 1 | SEQUENTIAL REPORT NO. 0 2 9 | OCCURRENCE CODE | REPORT TYPE | REVISION NO.

ACTION TAKEN (18) | FUTURE ACTION (19) | EFFECT ON PLANT (20) | SHUTDOWN METHOD (21) | HOURS (22) | ATTACHMENT SUBMITTED (23) | NPRD-4 FORM SUB. (24) | PRIME COMP. SUPPLIER (25) | COMPONENT MANUFACTURER (26)

CAUSE DESCRIPTION AND CORRECTIVE ACTIONS (27)

1 0

1 1

1 2

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1 5 | FACILITY STATUS (28) | % POWER (29) | OTHER STATUS (30) | METHOD OF DISCOVERY (31) | DISCOVERY DESCRIPTION (32)

1 6 | ACTIVITY RELEASED (33) | CONTENT OF RELEASE (34) | AMOUNT OF ACTIVITY (35) | LOCATION OF RELEASE (36)

1 7 | PERSONNEL EXPOSURES NUMBER (37) | TYPE (38) | DESCRIPTION (39)

1 8 | PERSONNEL INJURIES NUMBER (40) | DESCRIPTION (41)

1 9 | LOSS OF OR DAMAGE TO FACILITY TYPE (42) | DESCRIPTION (43)

2 0 | PUBLICITY ISSUED (44) | DESCRIPTION (45)

NRC USE ONLY

NAME OF PREPARER _____ PHONE: _____

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