



# Duquesne Light

Nuclear Division  
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April 25, 1983

/United States Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Attn: Thomas T. Martin, Director  
Division of Engineering and Technical Programs  
Region 1  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Reference: Beaver Valley Power Station, Unit No. 1  
Docket No. 50-334, License No. DPR-66  
IE Inspection Report No. 82-19

Gentlemen:

In response to your letters of September 16, 1982 and March 24, 1983, and in accordance with 10 CFR 2.201, the attached reply addresses Violation C of the Notice of Violation which was included as Appendix A with the referenced Inspection Report.

We respectfully request that the Commission re-evaluate Violation C of Inspection 82-19. This is based upon further discussions and reviews with the inspectors as described in the attached reply.

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

Very truly yours,

J. J. Carey  
Vice President, Nuclear

Attachment

cc: Mr. W. M. Troskoski, Resident Inspector  
U. S. Nuclear Regulatory Commission  
Beaver Valley Power Station  
Shippingport, PA 15077

U. S. Nuclear Regulatory Commission  
c/o Document Management Branch  
Washington, DC 20555

Mr. P. Tam, Project Manager  
U. S. Nuclear Regulatory Commission  
Operating Reactors Branch  
Division of Licensing  
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DUQUESNE LIGHT COMPANY  
Beaver Valley Power Station  
Unit No. 1

Reply to Notice of Violation  
Inspection 82-19  
Letter Dated September 16, 1982

VIOLATION C (Severity Level IV; Supplement V.D)

Description of Violation (82-19-03)

10 CFR 71.62(c) requires the licensee to maintain during the life of a package to which they pertain, quality assurance records of the monitoring, inspection and auditing of work performance during modification, maintenance, and repair of the packaging.

Contrary to the above, during 1982, the licensee has used packages, Model Nos. AL-33-90, CNS 8-120, and CNS 14-195-H, to transport licensed material, and the licensee has not maintained quality assurance records for these packages of the monitoring, inspection and auditing of work performance during modification, maintenance and repair of the packaging.

Discussion

Based upon further discussions with the region-based inspector and Resident Inspector concerning this violation, we have concluded that there was a misunderstanding between the inspector and plant personnel as to which documentation was requested for production during the audit. We have determined the documentation requested was in our files at the time of the inspection, and we have produced the appropriate records for review by the Resident Inspector. We understand that the Resident Inspector has determined that the documents in our possession meet the requirements of 10 CFR 71.62(c).

We request that you reconsider Violation C of Inspection 82-19 in light of the findings by your inspection personnel and, based upon your favorable determination in this regard, we request that Violation C of Inspection 82-19 be withdrawn and your records adjusted accordingly.