U. S. NUCLEAR REGULATORY COMMISSION
Region I

Report No. 50-412/83-08

Docket No. 50-412

License No. CPPR-105 Priority -- Category A

Licensee: Duquesne Light Company

Robinson Plaza Building No. 2

Suite 210, PA Route 60

Pittsburgh, Pennsylvania 15205

Facility Name: Beaver Valley Power Station, Unit 2

Inspection At: Shippingport, Pennsylvania

Inspection Conducted: June 27 - July 1, 1983

Inspectors: Lewis Narrow 7/19/83
L. Narrow, Lead Reactor Engineer date signed

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date signed

Approved By: J. P. Durr 7/25/83
J. P. Durr, Chief, Materials and Processes Section date signed

Inspection Summary:
Inspection on June 27 - July 1, 1983 (Report No. 50-412/83-08)

Areas Inspected: Routine, unannounced inspection by a region based inspector of piping installation and review of related QC records. The inspection involved 30 inspector hours onsite.

Results: One violation was identified in one of the two areas inspected; failure to comply with the requirements of the QA procedure for control of "Hold Tags" (Paragraph 4).

DETAILS

1. Persons Contacted

Duquesne Light Company (DLC)

*L. E. Arch, Senior QA Engineer
*R. Coupland, Director, QC
*C. R. Davis, Director, QA
R. Dieter, Lead Inspector, Area C
*C. E. Ewing, Manager, QA
*R. Fedin, Compliance Engineer
H. R. Good, Senior QC Weld Specialist
G. Kaloz, Senior QC Engineer
*M. A. Kauffman, QC Inspection Supervisor
*S. K. Mukherjee, Project Engineer
*J. Stabb, Compliance Engineer

Stone and Webster Engineering Corporation (S&W)

*C. R. Bishop, Senior Resident Manager
*A. C. McIntyre, Superintendent, Engineering

Schneider Power Corporation (SPC)

*T. Biernat, Site Project Manager
M. Buckland, Site Project Engineer
C. Kraus, Area Superintendent

*Attendees at exit meeting.

2. Plant Tour

The inspector made a tour of the facility to observe work in progress, completed work and construction status. Control and protection of material and equipment was observed. Areas toured included the reactor building, auxiliary building, service building and safeguards building.

No violations were observed.

3. Piping Installation Activities

The inspector observed installation and partially installed condition of the Residual Heat Removal (RHR) and Safety Injection System (SIS). Activities observed included handling, protection and installation of pipe spools. The inspector requested and was furnished test reports of "SILTEMP" cloth which was purchased as a pre-engineered material for protection of piping during welding and burning operations.

Inspection of piping installation was discussed with licensee personnel. A program for verification of conformance to design requirements has not been provided. The inspector was informed that this question has previously been identified by the Senior Resident Inspector as an unresolved item (50-412/82-02-03) but that the licensee had not yet determined the requirements of such a program. The inspector was informed that a position concerning a verification program will be established by the licensee (Project Management) within the next three months.

This item remains unresolved.

4. SIS Piping

The inspector observed the as-installed condition of the SIS piping for conformance to the design as shown on isometric drawings (ISO) No. 108201-2D and 108202-2C and Specification 2 BVS-920, "Field Fabrication and Erection of Piping ASME Section III, Classes 1, 2 and 3 and ANSI B31.1.0, Class 4". This line (Loop 23) was essentially complete between Safety Injection Accumulator Tank 2 SIS-Tk21C and spool piece SIS-69-4A and conformed to the design requirements.

A "hold" tag dated June 11, 1983 had been placed on SIS-69-4A at weld joint 2-SIS-069-F-506. The weld data sheet showed a required wall thickness for this pipe (class 1502) of 1.148 inches and VT measurements had shown a minimum reading of 1.118. The SQC representative removed this tag and explained that review of the proposed Nonconformance and Disposition (N&D) report specification 2 BVS 939A had shown that the required minimum wall thickness for this line was actually 1.10 inches and that this "hold" tag should have been removed earlier. The inspector noted that neither the N&D report nor the "hold" tag was numbered and that the "hold" tag was identified on the N&D report as "temporary". He questioned this informal treatment of an apparent nonconformance. He was informed by licensee representatives that the inspectors generally placed an unnumbered temporary "hold" tag on items considered to be nonconforming and prepared an N&D report. If the N&D report was not approved, the inspector would remove the temporary "hold" tag. If the N&D report was approved the tag would be numbered. In this case the N&D report was not approved but the tag had not been removed.

Schneider Power Corporation (SPC) QA Manual Section 16.0, Rev. 3 requires that an N&D report be prepared when an item not in accordance with the code, specifications or drawings, that it be recorded in the Master Conformity Log and that a numbered "hold" tag or sticker be attached to the nonconforming item and that the "hold" tag number be recorded in a Master Tag Log and referenced in the N&D report. After the N&D disposition is carried out and the N&D is closed the "hold" tag will be destroyed.

The informal treatment of nonconformance and use of temporary "hold" tags is not in accordance with the approved procedure and is a violation of 10 CFR 50, Appendix B, Criterion XV. (412/83-08-01)

5. Piping Records

a. N&D Reports

The inspector reviewed N&D reports of nonconformance identified on SPC work during April - June 1983. These records were legible, properly identified and readily retrievable. They were routinely processed for resolution and corrective action. The records showed evidence of review for generic problems. In May 1983, Site Engineering identified a potential generic problem in installation of non-ASME materials in ASME systems. However, the inspector noted that between April 11 and June 9, 1983 the established Authorized Nuclear Inspector (ANI) "hold" points had been bypassed four times. This was discussed with SQC as a recurrent problem and the inspector was informed that it would be referred to the Trend Analysis Committee (TAC) for review and further action if necessary.

This item is unresolved pending analyses by TAC and review by an NRC inspector (412/83-08-02)

b. Audits

The inspector reviewed the licensee's audit schedule and three audits of SPC activities during 1982 and 1983. Findings are reported to the audited organization and are followed for corrective action. One scheduled audit in 1983 had been deferred since the licensees auditors participated in an S&W audit of SPC in March 1983.

No violations were identified.

6. Independent Analysis of Materials

Paragraph 6.3.7 of Inspection Report 50-412/83-05 identified carbon and stainless steel pipe and welding materials that were obtained from the Beaver Valley Unit #2 site nuclear materials storage area for independent analysis. The chemical analysis of elements including carbon, manganese phosphorus, sulfur, silicon, nickel, chromium, molybdenum and copper were compared to the specification requirements and the expected values for the materials evaluated. This independent analysis was performed on samples of SA106 Gr B, 316 SS and 304 SS piping and on E7018, ER70-S-2, E308 and ER 308L welding materials.

No deviations in chemical content were noted.

7. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, violations or deviations. An unresolved item disclosed during the inspection is discussed in Paragraph 5.

8. Exit Interview

An exit interview was held on July 1, 1983 with members of the licensees staff and contractors as denoted in Paragraph 1. The inspector discussed the scope and findings of the inspection. The Senior Resident Inspector, Mr. G. Walton also attended the exit interview.