



Duquesne Light

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December 2, 1982

United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

ATTENTION: Mr. Richard W. Starostecki
Division of Project and Resident Programs

SUBJECT: Beaver Valley Power Station - Unit No. 2
Docket No. 50-412
USNRC IE Inspection Report No. 50-412/82-12

Gentlemen:

This is in response to the Item of Violation cited in Inspection Report No. 50-412/82-12 and listed in Appendix A (Notice of Violation) attached to your letter to Mr. E. J. Woolever, dated October 29, 1982.

NRC VIOLATION (82-12-01)

10CFR50, Appendix B, Criterion V, requires that instructions, procedures, or drawings shall include appropriate acceptance criteria to assure that important requirements have been satisfactorily accomplished. The BVPS-2 PSAR states that the Quality Assurance Program utilizes the guidance of WASH 1309, Guidance on Quality Assurance Requirements During the Construction Phase of Nuclear Power Plants. ANSI N45.2.2, endorsed by Regulatory Guide 1.38 and WASH 1309, requires instrumentation equipment to be stored under Level B conditions (as defined therein) and requires measures to be established to protect the equipment from the effects of airborne contamination. Further, BVPS-2 Specification 2BVS-981, Requirements during Storage, assigns Level B storage conditions to instrument and control cabinets and requires that measures be implemented for equipment protection from physical damage and airborne contamination.

Contrary to the above, on October 6, 1982, the Primary Process Racks and Cabinets, Motor Control Centers and the Main Control Board and Emergency Shutdown Panels, located in plant level B

storage areas, were not protected from airborne contamination. Penetration caps protecting the cabinets had been removed and protective plugs were missing from the electronic equipment installed in the equipment cabinets.

This is a Severity Level IV violation (Supplement II).

RESPONSE

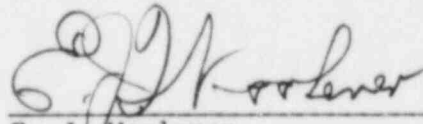
Beaver Valley Power Station Unit No. 2 management evaluated the existing site storage program and determined that the storage program procedures should be upgraded to provide supplemental protection beyond current controls against airborne contamination. The storage specification (2BVS-981) and field construction procedures dealing with housekeeping criteria (FCP-5.0 and 5.1) will be revised as follows:

- A. A new Housekeeping Zone IIIA will be added to FCP-5.1, "Requirements for Establishing and Maintaining Cleanliness Zones," to provide greater control of all airborne contaminate-producing work activities in the area. Coordinators will be assigned to each Zone IIIA area to ensure that no conflicting work activities are in progress at the same time. As an example, most of the Control Building will be designated a Zone IIIA area.
- B. A new section will be added to FCP-5.0, "General Housekeeping," to define those minimum preventive measures to be applied when performing airborne contaminate-producing work activities in a Zone IIIA area or other areas within specified minimum distances from electrical panels that are not sealed.
- C. Two existing attributes (809 and 819) in 2BVS-981, "Specification for Storage and Maintenance During Storage of Permanent Plant Equipment During the Construction Phase," will be revised to provide greater detail as to the intended function of covers as they apply to various levels of storage. Emphasis shall be placed on protection against the harmful effects of airborne contaminants and physical damage.
- D. 2BVS-981 will be revised to assign the appropriate storage and maintenance requirements for all permanent plant equipment which presently indicate no maintenance after installation.
- E. 2SMR-1 in Attachment 3 of 2BVS-981 which addresses all equipment supplied under the NSSS specification (2BVS-1) will be revised to assign storage attributes 809 and/or 819 for all electric equipment.

These procedure changes, implemented with appropriate retraining of personnel, establishes a storage program that emphasizes protection against airborne contamination for electrical equipment stored under Level B conditions (as defined in ANSI N45.2.2). The above changes will be implemented by February 1, 1983.

These actions are expected to prevent any future recurrence of the conditions identified in violations 82-12-01 or 82-08-01. In addition, the equipment is given a thorough final cleaning and inspection at the time of release of equipment by Construction to the Start-up Group. This will ensure removal of residual dirt or any contaminants which may have escaped detection during the construction phase.

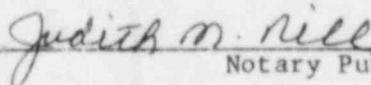
DUQUESNE LIGHT COMPANY

By 
E. J. Woolever
Vice President

RWF/wjs

cc: NRC Document Control Desk
Mr. G. Walton, NRC Resident Inspector
Ms. E. Doolittle, Project Manager

SWORN AND SUBSCRIBED TO ME THIS
3rd DAY OF December, 1982.


Notary Public

JUDITH M. NILL, NOTARY PUBLIC
ROSS TOWNSHIP, ALLEGHENY COUNTY
MY COMMISSION EXPIRES MAY 28, 1984
Member, Pennsylvania Association of Notaries

COMMONWEALTH OF PENNSYLVANIA)

) SS:

COUNTY OF ALLEGHENY)

On this 3rd day of December, 1982, before me,
Judith M. Nill, a Notary Public in and for said Commonwealth and
County, personally appeared E. J. Woolever, who being duly sworn, deposed
and said that (1) he is Vice President of Duquesne Light, (2) he is duly
authorized to execute and file the foregoing Submittal on behalf of said
Company, and (3) the statements set forth in the Submittal are true and
correct to the best of his knowledge.

Judith M. Nill

JUDITH M. NILL, NOTARY PUBLIC
ROSS TOWNSHIP, ALLEGHENY COUNTY
MY COMMISSION EXPIRES MAY 28, 1984
Member, Pennsylvania Association of Notaries