Appendix A

Notice of Violation

Duquesne Light Company Beaver Valley Power Station, Unit 2 Docket No. 50-412 License No. CPPR-105

As a result of the inspection conducted on November 2 - December 10, 1982, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C) published in the <u>Federal Register</u> on March 9, 1982 (47 FR 9987), the following violation was identified:

10 CFR 50, Appendix B, Criterion IX, states that measures shall be established to assure that special processes such as welding and nondestructive testing are accomplished in accordance with applicable codes, standards, and criteria.

In PSAR Amendment 9, Duquesne Light Company committed to nondestructive testing and examination of the containment lines in accordance with Regulatory Guide 1.19 which indicates that containment penetrations not backed by concrete are to be examined in accordance with the methods of NE 5120 of Section III of the ASME Boiler and Pressure Vessel Code.

For containment pressure boundary closure butt welds of electrical penetration assemblies, NE 5120 or NE 5220 in ASME Code Editions after the Winter 1971 Addenda, requires either radiographic or, as a substitute, ultrasonic plus liquid penetrant or magnetic particle examination of such joints.

Contrary to the above, as of December 10, 1982, Specification 2 BVS-931, Appendix J, applicable to containment pressure boundary closure butt welds for electrical penetrations not backed by concrete at elevation 740 of the cable vault area, did not assure that nondestructive testing of such welds was accomplished in accordance with applicable ASME Code requirements. Although this specification stated that such welding would be in accordance with the requirements of ASME Section III, 1971 Winter 1972 Addenda, it neither required radiographic nor ultrasonic examination of these welds.

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

Pursuant to the provisions of 10 CFR 201, Duquesne Light Company is hereby required to submit to this office, within 30 days of the date of this letter transmitting this Notice, a written statement or explanation in reply, including: (1) corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violation; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending your response time.

8301170455 830103 PDR ADOCK 05000412 0 PDR