

FEB 16 1994

Docket Nos. 50-334
50-412

Mr. J. D. Sieber
Senior Vice President
Nuclear Power Division
Duquesne Light Company
Post Office Box 4
Shippingport, Pennsylvania 15077

Dear Mr. Sieber:

SUBJECT: COMBINED INSPECTION 50-334/93-22 AND 50-412/93-23

This letter refers to your February 2, 1994 correspondence, in response to our January 5, 1994 letter.

Thank you for informing us of the corrective and preventive actions documented in your letter regarding violation of containment integrity requirements. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:
James C. Linville

James C. Linville, Chief
Projects Branch No. 3
Division of Reactor Projects

cc:
G. S. Thomas, Vice President, Nuclear Services
D. E. Spoerry, Vice President, Nuclear Operations
L. R. Freeland, General Manager, Nuclear Operations Unit
K. D. Grada, Manager, Quality Services Unit
N. R. Tonet, Manager, Nuclear Safety Department
H. R. Caldwell, General Superintendent, Nuclear Operations

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Mr. J. D. Sieber

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FEB 16 1994

cc w/cy of Licensee's Response Letter:
K. Abraham, PAO (2 copies)
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
Commonwealth of Pennsylvania
State of Ohio

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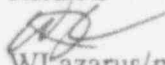
Mr. J. D. Sieber

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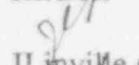
FEB 16 1994

bcc w/cy of Licensee's Response Letter:
Region I Docket Room (with concurrences)
W. Lazarus, DRP
D. Lew, DRP
M. Oprendeck, DRP
W. Butler, NRR
G. Edison, NRR
V. McCree, OEDO

RI:DRP


WLazarus/meo
2/16/94

RI:DRP


JLinville
2/16/94

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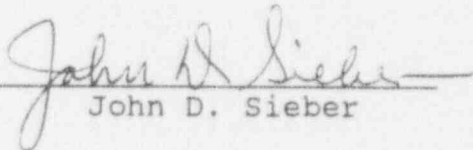
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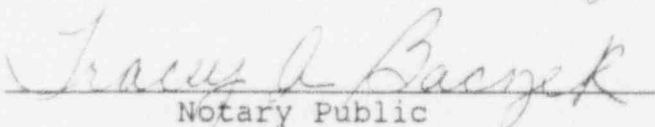
COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF BEAVER)

Subject: Beaver Valley Power Station, Unit No. 2
BV-2 Docket No. 50-412, License No. NPF-73
Combined Inspection Report 50-334/93-22 and 50-412/93-23
Reply to Notice of Violation

Before me, the undersigned notary public, in and for the County and Commonwealth aforesaid, this day personally appeared John D. Sieber, to me known, who being duly sworn according to law, deposes and says that he is Senior Vice President and Chief Nuclear Officer of the Nuclear Power Division, Duquesne Light Company, he is duly authorized to execute and file the foregoing submittal on behalf of said Company, and the statements set forth in the submittal are true and correct to the best of his knowledge, information and belief.


John D. Sieber

Subscribed and sworn to before me
on this 2nd day of February, 1994


Notary Public

Notarial Seal
Tracey A. Baczek, Notary Public
Shippensburg, Beaver County
My Commission Expires Aug. 15, 1997
Member, Pennsylvania Association of Notaries

Duquesne Light Company

Beaver Valley Power Station
P.O. Box 4
Shippingport, PA 15077-0004

JOHN D. SIEBER
Senior Vice President and
Chief Nuclear Officer
Nuclear Power Division

February 2, 1994

(412) 393-5255
Fax (412) 643-8069

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

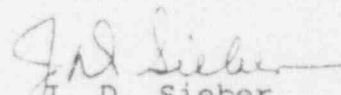
**Subject: Beaver Valley Power Station, Unit No. 2
Docket No. 50-412, License No. NPF-73
Combined Inspection Report 50-334/93-22 and 50-412/93-23
Reply to Notice of Violation**

In response to NRC correspondence dated January 5, 1994, and in accordance with 10 CFR 2.201, the attached reply addresses the Notice of Violation transmitted with the letter.

The cited event was discussed in combined Inspection Report Nos. 50-334/93-22 and 50-412/93-23 and also during an Enforcement Conference held on November 19, 1993.

If there are any questions concerning this response, please contact Mr. N. R. Tonet at (412) 393-5210.

Sincerely,


J. D. Sieber

Attachment

cc: Mr. L. W. Rossbach, Sr. Resident Inspector
Mr. T. T. Martin, NRC Region I Administrator
Mr. G. E. Edison, Project Manager
Mr. J. C. Linville, Chief, Project Branch No. 3
Division of Reactor Projects, Region I

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DUQUESNE LIGHT COMPANY
Nuclear Power Division
Beaver Valley Power Station, Unit No. 2

Reply to Notice of Violation

Combined Inspection Report 50-334/93-22 and 50-412/93-23
Letter dated January 5, 1994

VIOLATION (Severity Level III; Supplement I)

Description of Violation (50-412/93-23-02)

Beaver Valley Unit 2 Technical Specification 3.9.4 requires that during core alterations, containment penetrations that provide direct access from the containment atmosphere to the outside atmosphere, other than for the containment purge and exhaust valves, be closed by an isolation valve, blind flange, manual valve, or approved functional equivalent.

Contrary to the above, from October 3, 1993 through October 6, 1993, during core alterations, spare containment penetration 2RCP-8D, which provided direct access from the containment atmosphere to the outside atmosphere (which was for other than the containment purge and exhaust valves), was not closed by an isolation valve, blind flange, manual valve, or approved functional equivalent. Specifically, the penetration was not closed, in that appropriate sealant was not applied below the lower cable tray, which left a pathway between containment and the outside atmosphere.

Reason for the Violation

The Independent Safety Evaluation Group (ISEG) performed a root cause evaluation of the event. The root causes of this event were inadequate installation by the seal installer, inadequate independent verification by the Quality Control personnel involved in not identifying the unsealed area, and a human factors environment which led to the belief, by the personnel involved with the seal installation, that the penetration had been properly sealed.

Corrective Action Taken

1. The following immediate corrective actions were taken:
 - a) After discovering the leaking electrical penetration, fuel movement was immediately halted.
 - b) This event was reported to the NRC via a 10 CFR 50.72 four hour notification and subsequently reported in LER 93-011.
 - c) The leaking penetration was inspected, and a small area under the bottom cable tray was found to be open. This leakage path was properly sealed, inspected and satisfactorily tested.

Corrective Action Taken, Continued

2. The seal installer's qualification was suspended pending retraining for unique penetration designs.
3. A reinspection of all Fourth Refueling Outage (2R04) seals installed by the involved seal installer was performed with no deficiencies noted.
4. All penetration seal installers and supervisors were alerted to the potential for unique penetration designs that may include small unused spaces.
5. Any further temporary containment penetration sealing was suspended for 2R04.
6. Installation personnel and the Quality Control inspector involved in the incident were disciplined.

Action Taken to Prevent Recurrence

1. All penetration seal installers and supervisors have been retrained on unique penetration designs that may include small unused spaces.
2. Procedure 1/2CMP-47-Penetration-1ME "Installation and Removal of Temporary Containment Penetrations" will be revised to:
 - Add work practices and installation details sufficient to identify and seal all spaces of a penetration.
 - Require a post installation qualitative differential pressure test to verify proper installation of temporary containment penetration seals.
3. The Quality Control (QC) inspection process will be improved by:
 - Strengthening the QC checklist used for penetration inspections. This was recently completed.
 - Evaluating changes to the QC training module on all types of penetration and fire seals.
 - Performing an assessment of occasionally performed QC inspections to determine if more detailed inspection procedures are required.

Date When Full Compliance Will Be Achieved

We are in full compliance at this time.

Procedure 1/2CMP-47-Penetration-1ME will be revised prior to the Beaver Valley Unit 1 Tenth Refueling Outage (1R10) or prior to the next installation of a temporary containment penetration seal.

Reply to Notice of Violation
Combined Inspection Report 50-334/93-22 and 50-412/93-23
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Date When Full Compliance Will Be Achieved, Continued

The evaluation of changes to the QC training module on penetration and fire seals will be completed by March 31, 1994.

The assessment of occasionally performed QC inspections and any revisions to inspection procedures will be completed by July 31, 1994.