



Duquesne Light

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October 20, 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. 50-412/82-09

Gentlemen:

This is in response to the Item of Violation cited in Inspection Report #50-412/82-09 and listed in Appendix A (Notice of Violation) attached to your letter to Mr. E. J. Woolever, dated September 14, 1982.

NRC VIOLATION (82-09-01)

10CFR50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures.

BVPS-2 Specification 2BVS-981, "Requirements During Storage," requires that valves manufactured by Henry Pratt be inspected yearly and receive an application of silicone grease to the valve seats to prevent deterioration.

Inspection Procedure IP-5.2.1, Storage Inspection, paragraph 5.2, requires the inspector to record the results of his inspection on a Storage Facility Inspection Report.

Contrary to the above, on August 12, 1982, no records were available to indicate inspection and grease applications were performed on valves ordered under Specification 2BVS-069 and 2BVS-087A.

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

RESPONSE

On receipt of the above Violation (82-09-01), Beaver Valley Unit 2 initiated a review to establish the scope of the problem. This review confirmed that the two (2) Category I valves ordered under 2BV-76 had been inspected in accordance with our Engineering instructions given in 2BVS-981, relative to Henry Pratt Company valves identified in NRC Inspection and Enforcement Circular 77-11 (IEC 77-11).

The Equipment-Storage Maintenance History Cards (ESHC) for the 2BV-76 valves indicated an initial check for silicone grease was done in December, 1979, with subsequent yearly checks.

This review also established that two (2) valves of this type had been received on the remaining Category I Purchase Order, 2BV-69. Our review indicates that initial inspections were performed in January, 1980, but no evidence of further annual inspections as required by 2BVS-981 could be established. An engineering evaluation will be performed of the condition of the affected seating to establish whether the failure to maintain these valves on an annual basis has any adverse effect on the material. This evaluation will be completed by November 1, 1982. The inspection involved in this evaluation will also establish the condition of the grease as applied. Should additional grease be needed, it will be added at this time.

Beaver Valley Unit 2 has had difficulty in establishing the cause for the failure to record and/or perform the subsequent yearly grease inspections for the two 2BV-69 valves. Therefore, a joint Construction/Quality Control review of the maintenance records will be performed by November 30, 1982, of sufficient quantity to establish whether this was generic or an isolated incident. The results of the inspection of the two valves and the joint Construction/Quality Control review will be made available to the NRC Resident Inspector.

Additional actions were taken relative to 82-09-01. 2BVS-981, "Storage and Maintenance During Storage of Permanent Plant Equipment During the Construction Phase," was revised to add an attribute for verification and application of grease on a yearly basis to seats of valves on purchase orders 2BV-76 and 2BV-69. Valves ordered on these purchase orders were reviewed to assure that all valves which require checks for silicone grease are identified in 2BVS-981. Individual ESHC cards will be issued for all valves which require maintenance rather than one card for each purchase order as was done in the past. These actions, in addition to the Construction/Quality Control review meeting, should avoid any further violations in regard to IEC 77-11.

Duquesne Light Company was also cited for a violation against 10CFR50 Appendix B Criterion V, based on an audit of storage records for valves ordered to specification 2BV-87A during the IEC 77-11 review. Duquesne Light Company disputes that 10CFR50 Appendix B criteria was violated regarding specification 2BV-87A.

IEC 77-11 listed problems in regard to containment isolation valves involved with containment purge and ventilation systems. IEC 77-11 was concerned with assuring the continued nearly leak-tight behavior of these large butterfly isolation valves with respect to containment integrity and not catastrophic valve failure. It recommends that licensees "assess the acceptability of testing frequency and maintenance schedules for existing valves of the type described." Duquesne Light Company confirms that valves purchased per 2BV-87A are not any type of containment isolation valve described in IEC 77-11 nor are they safety-related valves.

10CFR50 Appendix B states "The pertinent requirements of this appendix apply to all activities affecting the safety related functions of those structures, systems, and components." All subject valves ordered per specification 2BV-87A are classified as Quality Assurance Category II valves. Duquesne Light Company Quality Assurance procedure (QAP) DC-2, Revision 3, defines Category II as "Plant systems ... and equipment which are essential for the reliable generation of power but are not essential for a safe shutdown. Failure of this equipment could result in loss of generation, but would not endanger public safety." Since Category II does not apply to safety related equipment as required in the scope of 10CFR50 Appendix B and Duquesne Light Company presently has no reason to believe any valves have been incorrectly defined as Category II, Duquesne Light Company believe that the violation charge against specification 2BV-87A by the NRC was unwarranted.

Duquesne Light Company intends to construct a reliable electricity-producing facility which requires reliable operation of Category II valves. In this regard, plant maintenance procedures and valve inspections have been evaluated to resolve any Henry Pratt Company valve concerns described in IEC 77-11.

DUQUESNE LIGHT COMPANY

By E. J. Woolever
E. J. Woolever
Vice President

RWF/lev

cc: Mr. G. Walton, BV-2 NRC Resident Inspector
Ms. E. Doolittle, NRC Project Manager

COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF ALLEGHENY

On this 20 day of Oct, 1982, before me, _____,
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, information, and belief.

Carole A. Werwie
CAROLE A. WERWIE, NOTARY PUBLIC
ROBINSON TWP., ALLEGHENY COUNTY
MY COMMISSION EXPIRES MAR. 5, 1984
Member, Pennsylvania Association of Notaries
14-2082