

SEP 12 1983

Docket No. 50-412

Duquesne Light Company
Mr. E. J. Woolever
Vice President
Nuclear Construction
Robinson Plaza Building No. 2
Suite #210, PA Route 60
Pittsburgh, Pennsylvania 15205

Gentlemen:

Subject: Inspection 50-412/83-05

This refers to your letter dated August 5, 1983, in response to our letter dated July 6, 1983.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions, as well as those described below, will be examined during a future inspection of your licensed program.

With respect to Section II of your letter and based on our telephone discussion of August 17, 1983, our understanding of your corrective and preventive actions is as shown below:

1. Your response to Item 1 states that you take exception to the interpretation that a matrix or list of personnel designated as qualified reviewers is a requirement of ANSI N45.2.11. We agree with the requirements of Paragraph 7.1 of ANSI N45.2.1 as quoted in your letter. However, Stone and Webster Engineering Corporation (SWEC) choose to fulfill these requirements by identifying the authorized responsible engineers on an organization chart in the form of a matrix. As more fully described in Section 5.3.2 of Inspection Report 50-412/83-05, this matrix was discontinued on March 31, 1983 and an alternate method for identification of responsible engineers had not been instituted. The delegation of authority by title in SWEC procedures and as discussed in your letter is acceptable. However, the documents which delegate this authority are considered extensions of these procedures and should be controlled accordingly.
2. Copies of issued documents which are distributed to the reviewer that granted approval is not acceptable for meeting the requirement of paragraph 5.2.4 of ANSI N45.2.11. Positive confirmation must be evidenced at some point in the design cycle. We understand that the design review cycle is structured such that all design change documents are incorporated into the base design documents. Thus, within a reasonable period of time, all design changes are reconciled with the original design and approved by an authorized reviewer at that time. Further, Duquesne Light Company will analyze the design control systems to insure this is an accurate description of the process.

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- 3. Your response to Item 3 states that you have determined by inspection that the HVAC supports confirm that the specified condition has been achieved and that an inspection of piping and electrical supports will also be conducted. However, the necessary information was not specified on the documents supplied to the field. We are concerned about the omission of installation and inspection requirements from field documents on a generic basis. Based on our telephone conversation, we understand that this matter and your corrective actions will be addressed in a meeting proposed by you on or about October 18, 1983.

Your cooperation with us is appreciated.

Sincerely,

Original Signed by
S. D. Ebner

Tom
Thomas T. Martin, Director
Division of Engineering and
Technical Programs

cc:
E. Ewing, Quality Assurance Manager
R. J. Washabaugh, Project Manager
E. F. Kurtz, Jr., Manager, Regulatory Affairs
H. M. Siegel, Manager, Engineering
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
Commonwealth of Pennsylvania

bcc:
Region I Docket Room (with concurrences)
Senior Operations Office (w/o encls)
DPRP Section Chief
J. Grant, DPRP

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