



Duquesne Light

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August 25, 1983

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. 50-412/83-08

Gentlemen:

This is in response to the Item of Violation cited in Inspection No. 50-412/83-08 and listed in Appendix A (Notice of Violation) attached to your letter to Mr. E. J. Woolever, dated July 25, 1983.

NOTICE OF VIOLATION:

10CFR50, Appendix B, Criterion XV requires that measures for control of nonconforming materials or components shall include procedures for their identification, documentation and disposition and shall be conducted in accordance with those procedures.

The Beaver Valley Unit 2 PSAR, Section 17.1.1A states that the quality assurance program will conform to 10CFR50, Appendix B.

Schneider Power Corporation Nuclear Site Quality Assurance Manual, Section 16.0, Rev. 3 requires that inspection personnel shall prepare a Nonconformance and Disposition (N&D) report for nonconforming items, shall attach a numbered "hold tag" to the item, record the "hold tag" number on the Master Tag Log, reference the number on the N&D report and destroy the tag when the N&D report is closed.

Contrary to the above, on June 25, 1983, the inspector observed that an unnumbered hold tag had been attached to pipe spool SIS-69-4A, had been recorded on the N&D report as "temporary" and had not been removed and destroyed when the N&D report was closed.

RESPONSE:

Immediate Action

An investigation was performed into the mechanics of the system related to the numbering and registering of Hold Tags when the

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Schneider Power Corporation ASME III Program was being applied. It was established that the Weld Data Sheet and In-Process Check List, required by that program, did not provide for the recording of an unsatisfactory condition on an immediate basis. The DLC/SQC Inspection Report, however, provides for the prompt recording of such data. Because of this difficulty, the practice of attaching an unnumbered Hold Tag to the item, during an investigation of the condition, became routine.

Corrective Action

In order to assure that the condition described does not recur, the following action has been initiated. Schneider Power Corporation has already been assigned a special block of numbers applicable to both Nonconformance and Disposition Reports (N&D's) and Construction Deficiency Reports (CDR's) for their use relative to the ASME III Program. This block of numbers will be further broken down into blocks for specific areas and activities within the program. The use of unnumbered Hold Tags will be discontinued.

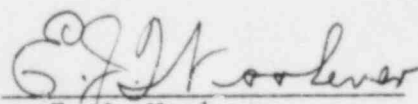
The Lead Inspector of each applicable area or activity will be responsible for maintaining a log of those N&D and CDR numbers assigned to him. In the event that a QC Inspector finds a nonconforming condition when the Weld Data Sheet or In-Process Check List is utilized in lieu of the DLC/SQC Inspection Report, the QC Inspector will affix a numbered Hold Tag to the item involved and obtain the appropriate N&D or CDR number from the previously referenced log. This number will then be entered on the Hold Tag and the N&D or CDR.

The N&D or CDR will then be processed in accordance with the existing procedures as described in the Schneider Power Corporation ASME III Manual and DLC/SQC Procedures.

In addition, a field review will be performed to correct the conditions of any unnumbered ASME III Hold Tags existing in the field at this time.

The above program will be implemented prior to September 1, 1983.

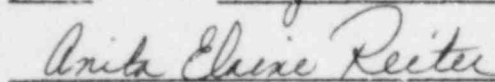
DUQUESNE LIGHT COMPANY

By 
E. J. Woolever
Vice President

JMM/wjs

SUBSCRIBED AND SWORN TO BEFORE ME THIS

25th DAY OF August, 1983.


Anita Elaine Reiter
Notary Public

ANITA ELAINE REITER, NOTARY PUBLIC
ROBINSON TOWNSHIP, ALLEGHENY COUNTY
MY COMMISSION EXPIRES OCTOBER 20, 1986

United States Nuclear Regulatory Commission
Mr. Richard W. Starostecki
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cc: Mr. G. Walton, NRC Resident Inspector
Ms. L. Lazo, Project Manager
NRC Document Control Desk

REFERENCE: NRC letter dated July 25, 1983, Docket No. 50-412

COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF ALLEGHENY)

On this 25th day of August, 1983, 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.

Anita Elvira Peña
Notary Public

ANITA ELAINE REITER, NOTARY PUBLIC
ROBINSON TOWNSHIP, ALLEGHENY COUNTY
MY COMMISSION EXPIRES OCTOBER 20, 1986