MAY 18 1984

Docket Nos. 50-334; 50-412

Duquesne Light Company
ATTN: Mr. J. J. Carey
Vice President
Nuclear Division
Post Office Box 4
Shippingport, Pennsylvania 15077

Gentlemen:

Subject: Systematic Assessment of Licensee Performance (SALP); Report Nos. 50-334/84-13; 50-412/84-06

The NRC Region I SALP Board has reviewed and evaluated the performance of activities at the Beaver Valley Power Station, Units 1 and 2, for the period December 1, 1982 through March 31, 1984. Separate SALP Board meetings were conducted for each unit; the results are contained in the enclosed reports dated May 14, 1984. Meetings to discuss these assessments have been scheduled for June 12, 1984. These meetings will be held in Shippingport, Pennsylvania, near the plants.

The Unit 1 SALP Board concluded that satisfactory or higher levels of performance occurred in all functional areas. It was also noted that steady or improved performance occurred in each area. In contrast, for Unit 2, it was concluded that only minimally satisfactory performance had occurred in some functional areas in that numerous problems were noted and progress in resolving the root causes(s) of such problems was inadequate.

At the SALP meetings, you should be prepared to discuss our assessment and your plans for improvements, particularly for Unit 2 in the areas of piping systems and supports, electrical power supply, and distribution and engineering/construction interface. Specifically, we want to discuss the following topics for Unit 2:

-- The number and nature of deficiencies that have been identified in the piping area (many of which were identified by our inspectors). These appear to be primarily due to deficient engineering documents supplied to the field for use by construction and QC personnel. This has been a recurring problem at Beaver Valley, Unit 2 in that it was also noted in the last SALP report. Of particular concern is the apparent failure of licensee and contractor internal processes and reviews to discover such problems before they are found by our inspectors. Are any changes in approach contemplated in view of the failures of present management control system(s) to detect and prevent such deficiencies? You should be prepared to discuss why such failures have occurred plus any plans/programs to determine if similar problems have occurred in other areas.

-- The continued slow progress in resolving electrical cable separation problems remains an NRC concern. Although Duquesne Light Company did commit to comply with Regulatory Guide 1.75 in the December, 1983 meeting with NRC, many deviations from RG 1.75 (and even from earlier engineering specifications) al-

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ready exist. Additional deviations have occurred during installation work since December while plans were being made to implement these commitments. We regard the lack of appropriate progress in this area to be indicative of inadequate management attention and/or priorization. You should have, and be prepared to discuss, a systematic program with a timely schedule for resolution of cable separation problems. In particular, your program should demonstrate the proper management commitment to resolve these problems.

-- Many of the problems in the engineering area appear to be due to difficulties that occur at engineering/construction interfaces. In particular, several engineering documents prepared at your architect-engineer's home offices have apparently not received adequate "constructability reviews" before they are transmitted to the site for use. When problems are encounted in the field, resolution is often cumbersome. Furthermore, corrective actions usually involve additional inspections, but fail to identify and correct the root cause(s) of such problems. You should be prepared to discuss how you plan to improve the engineering/construction interface.

-- In late April, 1984, changes were made in the functional project organization wherein it appears that Duquesne Light Company has reduced their involvement in day-to-day construction activities with a commensurate increase in Stone and Webster's responsibility. We consider it essential that licensees have strong involvement and control in all areas involving licensed activities. You should also be prepared to discuss the intent of these organizational changes and describe how adequate Duquesne Light control and involvment is to be maintained.

The meetings are intended to be a dialogue wherein any comments you may have regarding our reports may be discussed. Written response(s) addressing the above areas are requested within 20 days of the meeting.

Your cooperation is appreciated.

Sincerely,

Original Signed By:

Richard W. Starostecki, SALP
Board Chairman
Director, Division of Project
and Resident Programs

Enclosures: As Stated

cc w/encls:
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
Commonwealth of Pennsylvania

cc w/Report No. 50-334/84-13
F. Bissert, Manager, Nuclear Support Services
C. E. Ewing, QA Manager
W. S. Lacey, Station Superintendent
R. Druga, Chief Engineer
R. Martin, Nuclear Engineer
J. Sieber, Manager, Nuclear Safety and Licensing
T. D. Jones, Manager, Nuclear Operations
R. M. Mafrice, Nuclear Engineer
N. R. Tonet, Manager, Nuclear Engineering
M. Coppula, Superintendent of Technical Services

cc w/Report No. 50-412/84-06
E. J. Woolever, Vice President
C. E. Ewing, QA Manager
R. J. Washabaugh, Project Manager
E. F. Kurtz, Jr., Manager, Regulatory Affairs
H. M. Siegel, Manager, Engineering

bcc w/encl:
Region I Docket Room (with concurrences)
Senior Operations Officer (w/o encl)
DPRP Section Chief
T. Martin, RI

RT:DPRP	RA:DPRP
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