Docket No. 50-412

License No. CPPR-105

CAL No. 84-09

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

Gentlemen:

This refers to the telephone conversation conducted between you and Mr. Clifford Anderson of my staff on May 7, 1984, regarding the results of the inspection of your facility on April 2 - 5, 1984. (NRC Inspection No. 84-04). The inspection report was forwarded to you on May 31, 1984. The purpose of this conversation was to discuss your schedule for satisfying the R.G. 1.75, Electrical Separation Criteria. This issue was originally discussed with your staff in a December 20, 1983 NRC meeting in Bethesda, Maryland and documented in your letter to the NRC dated January 13, 1984. Further discussions regarding this schedule were conducted with your staff by Mr. Alan Finkel of my staff on May 8 and 9, 1984.

With regard to this matter, we understand that you have or will be taking the following actions:

- A revised copy of the electrical specification 2BVS-931 which endorses RG 1.75, was issued on April 3, 1984. Program documentation affected by 2BVS-931 will be identified, corrected, approved and issued by December 31, 1984.
- The walkdown of all your installed and in-process safety-related electrical systems will be completed by August 31, 1984. The inspection criteria used for this walkdown will be as defined in FCP-422 which reflects the criteria of 2BVS-931. The results of this task will be incorporated in the new computerized tracking system.
- The new computerized tracking system was prepared, verified and implemented by April 9, 1984. This system will be utilized throughout construction to fuel load. Areas identified as not able to comply with the 2BVS-931 criteria for separation will be identified in this system and a justification for acceptance will be prepared by the licensee.

The design of the enclosure barriers as described in your January 13, 1984 letter was started in mid-January 1984 and will continue through December 31, 1985. The December 31, 1985 date for design completion is to assure all possible configurations have been considered for this site. The barriers will allow compliance with the criteria for separation as defined in 2BVS-931.
 The ampacity analysis review of trays, was started January 10, 1984 and will be completed by July 15, 1984. Changes in design of completed raceways based on separation criteria of 2BVS-931 will be reviewed to assure that ampacity analysis values are still acceptable.
 The hazard analysis was started January 3, 1984 and will be completed by December 31, 1985. Changes due to these analysis will be reflected in completed designs referenced above and corrections will be identified and made to comply with 2BVS-931 separation criteria.

- The training coordinator has been assigned as of April 4, 1984. He will review and approve all training programs for the Color Separation Task to assure compliance with the criteria of 2BVS-931. He will also assure that personnel training will be started in accordance with approved training programs no later than May 14, 1984.
- Duquesne Light will provide the NRC resident with the management control information that is being used by your management personnel to assure that task assignments and dates are being complied with. We understand that you refer to these types of documents as a level 2 chart and a "program description".

The timely completion of the above activities is, critical to the success of this program. Therefore, we request that significant delays in implementation of the program activities be reported to the, Chief, Projects Section 3A, NRC, Region I.

If our understanding of your planned actions, as described above, is not in accordance with the actions being implemented, please contact this office immediately by telephone and in writing within 24 hours of your receipt of this letter.

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

J. J. Carey, Vice President, Nuclear Group

E. Ewing, Quality Assurance Manager R. J. Washabaugh, Project Manager

E. F. Kurtz, Jr., Manager, Regulatory Affairs

H. M. Siegel, Manager, Engineering

P. RaySircar, Stone and Webster Engineering Corporation

Public Document Room (PDR)

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Nuclear Safety Information Center (NSIC)

NRC Resident Inspector

Commonwealth of Pennsylvania

E. Licitra, NRC Licensing Project Manager

J. Knox, NRC NRR

bcc

Region I Docket Room (with concurrences)
DPRP Section Chief

J. Grant, DPRP

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