

JUN 15 1984

Docket No. 50-412

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:

Subject: Inspection 50-412/84-03

This refers to your letter dated May 17, 1984, in response to our letter dated April 16, 1984.

Your response to our "Notice of Violation" identified additional information beyond that available to our inspector during the inspection. This information (Nonconformance and Disposition Reports) appears to adequately address the acceptance of the loose wire clamps. Had the governing specification been changed to incorporate these changes, as required by engineering documents, and had the as-built condition of the wiring clamps been accepted in accordance with such a revised specification, our inspector would not have identified any deficiency between the existing specification requirements and the product. However, a violation did exist at the time of the inspection, although, based on the additional information supplied in your response, the root cause of the violation was a failure to revise the specification to incorporate approved changes rather than any unacceptable hardware conditions. Therefore, although your letter clarifies this matter, a violation was warranted and we do not plan to withdraw it as you have requested. Your corrective actions need to address measures to assure that governing specifications reflect all approved changes.

Your response to our item of concern regarding the increasing number of QC re-inspections that are necessary because of contractor initiated clarified/changed design requirements provided answers to the questions contained in our referenced letter. However, it was noted that the answers primarily described your on-going programs for confirming the adequacy of engineering information rather than any planned new initiatives to preclude recurrence. We understand that the purpose of the described change (requiring the engineering contractor to review all QC Inspection Procedures (IP's)) is to assist in quickly identifying any misunderstandings or communication problems rather than allowing engineering to have approval authority for IP's thereby possibly compromising the independence of QC.

As noted in our May 18, 1984 letter transmitting the most recent SALP Report, we continue to be concerned about deficiencies in engineering documents supplied to the field for use by construction and QC personnel. The effectiveness and success of the actions described in your referenced letter should be closely monitored and

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evaluated by your staff. We will want to discuss the results of such continuing assessments with you in the future as part of our ongoing followup efforts in this area.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

Richard W. Starostecki, Director
Division of Project and Resident
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)
- Local Public Document Room (LPDR)
- Nuclear Safety Information Center (NSIC)
- NRC Resident Inspector
- Commonwealth of Pennsylvania

bcc:

- Region I Docket Room (with concurrences)
- DPRP Section Chief
- J. Grant, DPRP

RI: DPRP
for
Walton/meo
6/27/84

RI: DPRP
yes
Tripp
6/4/84

RI: DPRP
RS
Starostecki
6/7/84

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