



Duquesne Light

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August 31, 1984

United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

ATTENTION: Dr. Thomas E. Murley
Administrator

SUBJECT: Beaver Valley Power Station - Unit No. 2
Docket No. 50-412
Removed, Dismantled, or Partially Dismantled Pipe Supports
Significant Deficiency Report No. 84-06, Interim Report

Gentlemen:

This interim report is in reference to the reportable significant deficiency relating to the removed, dismantled, or partially dismantled pipe supports. Pursuant to the requirements of 10CFR50.55(e), it is anticipated that a subsequent report will be submitted to Region I by October 1, 1984.

DUQUESNE LIGHT COMPANY

By E. J. Woolever
E. J. Woolever
Vice President

JS/wjs
Attachment

cc: Mr. R. DeYoung, Director (3) (w/a)
Ms. M. Ley, Project Manager (w/a)
Mr. E. A. Licitra, Project Manager (w/a)
Mr. G. Walton, NRC Resident Inspector (w/a)
INPO Records Center (w/a)
NRC Document Control Desk (w/a)

SUBSCRIBED AND SWORN TO BEFORE ME THIS
31st DAY OF August, 1984.

Anita Elaine Reiter
Notary Public

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

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BEAVER VALLEY POWER STATION - UNIT NO. 2
DUQUESNE LIGHT COMPANY

Report on Significant Deficiency No. 84-06
Removed, Dismantled, or Partially Dismantled Pipe Supports

1. Summary

Thirty-four (34) pipe supports, which were originally installed and inspected, were discovered to be removed, dismantled, or partially dismantled during an inspection by Site Quality Control (SQC). A subsequent investigation has shown that some of the supports were subject to Nonconformance and Disposition (N&D) reports which gave the inspection status. Other supports had only partial inspection (Hilti inspection) records. The twenty-four (24) supports were found to have acceptable inspection reports and will be addressed herein. A subsequent evaluation, as detailed in Section 4, indicates that the removal, dismantling, or partial dismantling of these 24 supports was not safety significant.

2. Immediate Action Taken

On June 11, 1984, Mr. J. Stabb, Compliance Engineering in Duquesne Light Company's (DLC) Regulatory Affairs Department, notified Mr. G. Myer of the NRC Region I Office of this reportable deficiency. DLC submitted additional information in letter 2NRC-4-101, dated July 12, 1984.

3. Description of the Deficiency

The 24 removed, dismantled, or partially dismantled pipe rack supports were discovered during an inspection by SQC. The supports were found to apply to a number of safety-related systems and various non-safety-related Seismic Category II systems.

4. Analysis of Safety Implications

The eight (8) pipe supports in safety-related systems have been determined to have adequate documentation (i.e., drawing changes, N&D's, and 2PA advanced engineering changes) to ensure SQC inspections following completion of work. Four (4) of the sixteen (16) non-safety-related Seismic Category II supports did not have adequate documentation to ensure required SQC inspections. For these four (4) supports, detailed investigations have revealed that failure to install these supports, or their failure under design basis event conditions, would not have resulted in any adverse impacts on safety-related components, systems, or functions. Therefore, these four (4) supports do not adversely affect the safety of operations of the plant.

5. Corrective Action to Remedy the Deficiency

In order to improve control of support rework, a Field Control Procedure (FCP-41, "Rework Control Program") will be implemented. DLC expects that this program will become effective during September, 1984.

DLC has taken action to ensure that the four (4) supports identified as having inadequate documentation receive all required inspections. Recent SQC investigations indicate that similar concerns may apply to eight (8) additional supports. DLC is continuing its evaluation of this issue and will provide additional information in a future report.

6. Additional Reports

It is anticipated that an additional report will be issued by October 1, 1984.