



# Duquesne Light

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September 20, 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. 50-412/84-06  
Systematic Assessment of Licensee Performance  
(SALP)

Gentlemen:

In your August 21, 1984 letter you had requested that we "periodically inform your office of progress on Beaver Valley Unit 2 initiatives, such as the RG 1.75 Action Plan, the efforts of the recently established constructability review group at the site, and the Engineering Confirmation Program."

A summary of our activities in these areas is described herein:

1. RG 1.75 Action Plan

In a meeting with NRC personnel on August 30, 1984, the status of activities of the BVPS-2 Regulatory Guide 1.75 Action Plan, as outlined in Attachment 1 to DLC's June 29, 1984 SALP response, was discussed in detail. Specific accomplishments cited for the program included:

- A. Electrical installation since May 18, 1984, has been in conformance with project commitments to Regulatory Guide 1.75 (Action Item I.A.1.b).
- B. A training program for engineers, designers, construction and QC personnel has been developed and implemented to define the revised separation requirements (Action Item I.A.2).
- C. A computer-based system to track existing separation problems has been developed and implemented (Action Item I.A.3).

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1. RG 1.75 Action Plan (Continued)

- D. An engineering walkdown of the plant to identify spatial separations which did not comply with the Project Commitments to Regulatory Guide 1.75 has been completed. The walkdown identified 1108 cases where rework was required. Of these, 23 require resolution by SWEC engineering and 180 by the electrical contractor's design group. We are projecting that these items will be dispositioned by both SWEC and their electrical contractor by September 30, 1984. Construction has committed to complete rework on all items by January 1, 1985. (Action Item I.A.4)
- E. Detailed walkdowns by Site Quality Control are proceeding based on the revised separation criteria (Action Item I.A.5).

Details of the planned enclosures, barriers or covers which will be used to meet the requirements of Regulatory Guide 1.75 were also presented at the referenced meeting (Action Items I.B.1.b, I.B.2, and I.B.3).

Sample installations of cable wraps have been completed in the plant and potential hardware configurations have been assembled for joint discussions by Engineering, Construction and Quality Control personnel.

Planned testing and analysis to qualify alternate arrangements of enclosures, barriers and covers are also proceeding in accordance with the action-plan schedule for resolving electrical separation concerns (Action Item I.A.6 and I.A.7).

Successful conclusion of the testing effort is expected to demonstrate that for certain physical configurations, fewer covers and enclosures than presently planned will satisfy the Regulatory Guide 1.75 criteria. A meeting with Mr. John Knox of NRR is presently scheduled for September 26, 1984, for detailed review of the planned test program and proposed FSAR amendment.

2. Constructability Review Group and other Engineering/Construction Interfaces

Six action steps were outlined in the June 29, 1984 SALP response. The status is as follows:

2. Constructability Review Group and other Engineering/  
Construction Interfaces (continued)

- A. A Constructability Review Group (CRG) was established in June for pipe support design review and in July for conduit support design review. These groups have identified a number of issues requiring clarification and/or redrafting to meet the objectives for these instructions to be clear, consistent and constructable. Recommendations have been forwarded to, and actions taken by engineering in this regard. Training of engineering and design staffs in the various offices providing these designs has been conducted and will continue as necessary to ensure project-wide understanding of this effort.

The CRG will continue to review the drawings and provide a level of assurance that instructions to the field are clear. Project management will adjust the level of participation and scope of the required training based on the review effort.

- B. Pipe rack drawings were a subject of concern because of the difficulty in interpreting engineering instructions and design details. These drawings have been redrafted and issued during July and August. The number of drawings issued has been increased to reduce the amount of detail on each.
- C. Formal feedback has been achieved via the Constructability Review Groups and the Senior Management Corrective Action Panel discussed in Paragraph F below. In addition, the project has sought and received feedback from contractor and construction personnel on other aspects of installation details. An example of this is in the instrumentation installation area. A comprehensive review of specification, drawing and procedural requirements has been conducted and necessary changes implemented. The Productivity Improvement Program has also been a source of feedback regarding repetitive issues impacting installation activities and training has been completed in the areas identified as deficient through this program.

2. Constructability Review Group and other Engineering/  
Construction Interfaces (continued)

- D. An additional task group has been established to provide better visibility and control of required changes. Project procedures have been issued describing this effort.
- E. In addition to the increased engineering support described in Item No. 3 below, additional experienced construction supervisors have been assigned to the construction management team and the contractors' staffs. This enables more definitive direction of, and closer monitoring of problems experienced by the crafts with installation details and expeditious problem resolution.

Two additional work locations have been provided for engineers working in the plant in support of craft labor. The number of engineers and designers working directly with craft supervisors has increased by eight since the SALP response and will continue to increase as required to support construction. The presence of senior engineering and construction management in the plant on a regular basis has also increased. Finally, the construction rework control program, as described in Field Construction Procedure FCP-41 has been implemented.

- F. The Senior Management Corrective Action Panel, (SEMCAAP) described in FCP-13 was established in July 1984. SEMCAAP acts upon recommendations from the Corrective Action Committee, directing action to resolve problems identified. The initial subject of SEMCAAP was a program to reduce the project backlog of outstanding Non-Conformance and Disposition Reports. SEMCAAP meets on a monthly basis to followup on directed action and to address new issues.

3. Engineering Confirmation Program and Related Site  
Engineering Activities

The Engineering Confirmation Program, established in 1983, is underway. The various aspects of the program have been scoped and scheduled.

3. Engineering Confirmation Program and Related Site  
Engineering Activities (continued)

DLC has completed the four (4) phases of its detailed program in accordance with issued procedures. These four (4) phases were reviewed with a Region I inspector during the week of September 10, 1984, as part of Inspection 84-14, and the inspector identified no concerns with this portion of the Confirmation Program. DLC has established a program to address continuing DLC Confirmation Program activities which was also reviewed with the inspector.

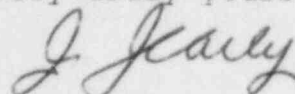
SWEC portions of the Confirmation Program are proceeding in substantial agreement with the established schedule. The conduct of these portions of the program are described and available for review in various project procedures.

The staffing of the Site Engineering Group (SEG) has been augmented with the addition of senior technical personnel. Since April 1, 1984, twenty-four additional engineers have been assigned to the SEG. This number includes three new Assistant Superintendents of Engineering, each of whom brings at least 10 years of engineering and construction experience to his position. Other examples of staffing changes to increase the level of supervisory experience are the addition of two principal engineers in the pipe support area and a senior design supervisor in the electrical design area. These personnel will expedite solutions to existing problems and minimize the occurrence of future problems. In addition to these permanent staff changes, SWEC management has appointed a Site Engineering Group Sponsor who reports to the SWEC Engineering Manager and provides management oversight of the SEG.

We are continuing to address the specific concerns listed in Attachment 4 of the Unit II SALP report and will pursue the commitments as submitted therein.

If you have any questions, do not hesitate to call.

Very truly yours,



J. J. Carey  
Vice President  
Nuclear Group