

FEB 21 1985

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 No. 50-412/84-10

This refers to your letter dated January 4, 1985, in response to our letter dated December 5, 1984.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

Stewart D. Ebnetter, Director  
Division of Reactor Safety

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


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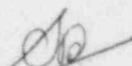
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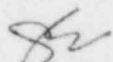
bcc w/encl:  
Region I Docket Room (with concurrences)  
Senior Operations Officer  
DRP Section Chief  
J. Grant, DRP

RI:DRSS   
Paolino/djh

2/4/85

  
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## Duquesne Light

Nuclear Construction Division  
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Pittsburgh, PA 15205

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January 4, 1985

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

ATTENTION: Mr. Richard W. Starostecki  
Division of Project and Resident Programs

SUBJECT: Beaver Valley Power Station - Unit No. 2  
Docket No. 50-412  
USNRC IE Inspection Report 50-412/84-10

Gentlemen:

In a letter to Mr. E. J. Woolever, dated December 5, 1984, you transmitted a Notice of Violation as Appendix A. This is Duquesne Light Company's response pursuant to the requirements of 10 CFR 2.201 and that Notice of Violation.

Notice of Violation:

As a result of the inspection conducted on August 13-17, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified:

10 CFR 50, Appendix B, Criterion XIII states in part that "measures shall be established to control the storage and handling of material and equipment in accordance with work and inspection instruction to prevent damage or deterioration."

FSAR Table 1.8-1 identified that the quality assurance requirement for storage and handling complies with Regulatory Guide 1.38, 1977 which endorses ANSI 45.2.2, 1972.

Paragraph 6.2.2, Item 1 of ANSI 45.2.2 states in part, "covers removed for internal access at any time for any reason shall be immediately replaced and resealed after completion of the purpose for removal."

Contrary to the above, on August 15, 1984, while in Warehouse B storage Level B area, the inspector noted that one Limitorque valve motor which required Level B storage was not sealed, exposing the internal to the environment.

This is a Severity Level V Violation (Supplement II).

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Pursuant to the provisions of 10 CFR 2.201, Beaver Valley Power Station is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

Response:

Corrective Action Taken

A survey was conducted to identify motors in site warehouse areas which require storage under Level B requirements. Eighty-four (84) motors were determined to belong in this category. The storage/packing of sixty-four (64) of these motors had been modified to facilitate meggering. The storage of these motors has been restored to the "as-received" condition, in compliance with ANSI 45.2.2, 1972. These actions were completed on August 24, 1984.

Corrective Steps to Avoid Further Violations

The monthly megger testing frequency specified in BVPS-2 documents has been changed to reduce the frequency of opening the protective coverings for these motors. The monthly frequency was in excess of that required by applicable standards. The megger tests are now required upon receipt of the equipment and again at time of system turnover. The applicable sections or attributes of 2 BVS-921 and 2 BVS-981 shall be revised to reflect this change. This reduced meggering frequency will enhance protection of the equipment by minimizing removal of protective covers.

Job site training meetings were conducted to ensure that the field craftsmen, foremen, and supervisors understand the storage level maintenance requirements.

Date When Full Compliance Will Be Achieved

All the above actions have been completed. DLC believes that these actions ensure compliance with ANSI 45.2.2, 1972 as endorsed by Regulatory Guide 1.38, 1973 which was specified in PSAR Chapter 17.

DUQUESNE LIGHT COMPANY

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

RW/slm  
NR/NRC/RESPONSE  
cc: G. Walton  
B. K. Singh  
NRC Document Control Desk

SUBSCRIBED AND SWORN TO BEFORE ME THIS  
4th DAY OF January, 1985.

Anita Elaine Reiter

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

COMMONWEALTH OF PENNSYLVANIA )  
  ) SS:  
COUNTY OF ALLEGHENY              )

On this 4th day of January, 1985, before me, a Notary Public in and for said Commonwealth and County, personally appeared E. J. Woolever, who being duly sworn, deposed and said that (1) he is Vice President of Duquesne Light, (2) he is duly authorized to execute and file the foregoing Submittal on behalf of said Company, and (3) the statements set forth in the Submittal are true and correct to the best of his knowledge.

Anita Elaine Reiter  
Notary Public

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