



Duquesne Light

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November 20, 1984

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 Valle Power Station - Unit No. 2
Docket No. 50-412
USNRC IE Inspection Report No. 50-412/84-09, Revised Response

Gentlemen:

This is a revised response to the Deviation cited in Inspection No. 50-412/84-09 and listed in Appendix B (Notice of Deviation) attached to your letter to Mr. E. J. Woolever, dated September 26, 1984.

Notice of Deviation

As a result of the inspection conducted on July 24 through August 24, 1984, it appears that several of your activities were not conducted in accordance with your commitments made in a meeting on May 17, 1984, and followup letters documenting your commitments dated May 17, 1984, and May 24, 1984.

The following examples have been identified as a deviation from your commitments:

1. Your commitment required revision to Stone and Webster Document 2BVM-88 to establish overfill criteria for cable raceways. You committed to complete and issue this revision by June 29, 1984.

Contrary to the above, as of August 1, 1984, this document was not revised.

2. Your commitment required revision to Stone and Webster Specification 2BVS-931 to address requirements and controls on visible cable tray overfill. You committed to complete and issue this revision by June 8, 1984.

Contrary to the above, as of August 1, 1984, this document was not revised.

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3. Your commitment required revision to Stone and Webster Field Construction Procedure FCP-431 to provide information to construction for control of cable raceway fill. You committed to complete and issue this revision July 30, 1984.

Contrary to the above, as of August 1, 1984, this document was not revised.

4. Your commitment required revision to Duquesne Light Inspection Procedure IP-8.4.1 to establish inspection criteria for cable tray overfill. You committed to complete and issue this revision by July 30, 1984.

Contrary to the above, as of August 1, 1984, this document was not revised.

Response

1. 2BVM-88 has been revised (Addendum 1, dated August 10, 1984) to delineate the engineering review procedure which must be completed prior to authorizing a cable tray overfill. These procedures include a checklist which will accompany all new computer overfill authorization forms and a list of required approval signatures. In the case of C and X trays, 100 percent fill in the design-basis computer system is based on a 3 inch usable depth of cable tray. However, all trays at BVSP-2 are constructed with a 4 inch usable depth. Therefore, if projected fill is between 100 and 133 percent, no detailed review effort will be performed. If the projected fill is greater than 133 percent, it will be verified that no practicable alternate routing exists. The engineers will then establish that the cable depth due to the new cables will be less than 1-1/2 inches above the tray side rails and will determine the projected weight due to the new cables. The signature of the Lead Structural Engineer (or his designee) will be required if the projected weight of tray cables, after overfill, exceeds 35 lb/ft. If the projected depth is greater than 1-1/2 inches above the side rail, the overfill authorization will not be approved.

Final cable installation and tray fill verification will be accomplished by DLC Site Quality Control (SQC).

2. Engineering and Design Coordination Report (E&DCR) 2P-4505 was issued August 2, 1984, to revise 2BVS-931 in accordance with the response to Item 1 above. The tray fill controls discussed in E&DCR 2P-4505 apply to both safety and nonsafety-related trays as well as tray fittings (e.g., tee's, crosses, etc.).
- 3&4. Change No. 15 to FCP 431, "Cable Pulling" was issued August 3, 1984, to meet commitment No. 3 above. Site Quality Control (SQC) has revised IP 8.4.1, dated August 9, 1984, to reflect the above requirements.

The revisions to FSAR Table 8.3-4 were submitted to the NRC in 2NRC-4-084 dated June 15, 1984. The change to the FSAR has been incorporated in Amendment 8.

The above actions complete the commitments documented in 2ASR-01126 and 2ASR-01135 from the meetings of May 17, 1984, and May 24, 1984. Completion of these commitments should provide the necessary controls on the amounts of cable overfill allowed. Completion of the revisions to the FSAR Table 8.3-4 ensures an accurate description of the amount of tray fills. These actions should provide the necessary information in order to close Unresolved Item 83-05-09, "Cable Raceway Fill."

DUQUESNE LIGHT COMPANY

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

JS/wjs
Attachment

cc: Mr. R. DeYoung, Director (3) (w/a)
Mr. B. K. Singh, Project Manager (w/a)
Mr. G. Walton, NRC Resident Inspector (w/a)
INPO Records Center (w/a)
NRC Document Control Desk (w/a)

COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF ALLEGHENY)

On this 20th day of November, 1984, 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 Ritten
Notary Public

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