



# Duquesne Light

Nuclear Construction Division  
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January 30, 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 No. 50-412/84-03, Supplemental  
Response

Gentlemen:

This is a supplemental response to the Item of Violation cited in Inspection No. 50-412/84-03 and listed in Appendix A (Notice of Violation) attached to your letter to Mr. E. J. Woolever, dated April 16, 1984. In the NRC letter from R. W. Starostecki to Mr. E. J. Woolever, dated June 15, 1984, the NRC expressed the following concern in regards to the DLC Response 2NRC-4-064, dated May 17, 1984:

"... 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."

DLC has completed its review of existing procedures and practices in response to these comments.

## Response

Project Procedure 2BVM-25, "Handling of Nonconformance and Disposition Reports (N&Ds)," defines the measures necessary to ensure that specifications reflect the as-built design of equipment. The procedure defines categories for approved N&Ds as either "change" or "nonchange" relative to the problem disposition and the requirements of the specification.

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The following summarizes the current procedural requirements for specification update:

<u>Category</u>	<u>N&amp;D Disposition</u>	<u>Type of Specification Change</u>
Change	"Repair"	Revise text or list in final issue of specification
	"Accept as is"	
Nonchange	"Rework"	List in final issue of specification
	"Scrap"	
	"Return to Vendor"	

Requirements for assigning a particular N&D disposition are provided in 2BVM-25, as well as guidance for determining whether a "change" N&D is to be incorporated into the text of the specification or listed in an appendix to the final specification as required by 2BVM-117, "Finalization of Engineering Documents for Purchase Orders and Contracts." The issuance of 2BVM-117 on April 11, 1979, now ensures that "rework" N&D's, such as the cited VSG-362, formerly N&D No. 20, will be listed in the final issue of the specification. Similarly, 2BVM-94 provides guidance on incorporating E&DCRs in specifications, and 2BVM-117 requires all E&DCRs which have not been incorporated in the text of the specification to be listed in the final revision of the specification.

Training on the above requirements has been conducted at both headquarters and the SEG since June 1983. It is our opinion that the implementation of the above-mentioned requirements is sufficient to ensure that all approved changes will be reflected in specifications.

DUQUESNE LIGHT COMPANY

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

JS/wjs

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

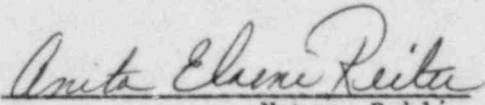
SUBSCRIBED AND SWORN TO BEFORE ME THIS  
30th DAY OF January, 1985.

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 30th 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.

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