



Duquesne Light

Nuclear Construction Division
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October 19, 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 Valley Power Station - Unit No. 2
Docket No. 50-412
USNRC IE Inspection Report No. 50-412/84-08

Gentlemen:

This is in response to the Item of Violation cited in Inspection No. 50-412/84-08 and listed in Appendix A (Notice of Violation) attached to your letter to Mr. E. J. Woolever, dated September 20, 1984.

Notice of Violation:

As a result of the inspection conducted on July 16-20, 1984, and in accordance with the NRC Enforcement Policy (10CFR2, Appendix C), the following violation was identified:

10CFR Appendix B, Criterion V, requires that "Activities affecting quality shall be prescribed by documented instructions, procedures ... and shall be accomplished in accordance with these instructions, procedures"

Installation Specification No. 2BV-977, Addendum 4, pages 1-35, lines 14-20, requires that caps or plugs be used for sealing tubing and instrument openings to prevent entry of dirt and dust.

Contrary to the above, on July 18 and July 19, 1984, the inspector identified several instruments and tubing runs that were not plugged nor capped.

Response:

Immediate Corrective Action:

DLC has covered the openings of the instrument tube connections with end caps. In addition, the mechanical contractor has replaced the taped coverings with end caps. End caps of the required sizes are available on site in adequate quantities.

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Long Term Corrective Action:

In order to avoid similar occurrences in the future, DLC has instructed the mechanical contractor to provide retraining for designated instrumentation personnel during the week of October 15, 1984. This retraining is to stress the protection and handling requirements for instruments and instrument tubing during the construction process.

The site equipment storage monitoring program includes walkdowns to verify that openings are covered. This program will include checks to verify that end caps are in place for instrument tubing runs.

DUQUESNE LIGHT COMPANY

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

JS/wjs
Attachment

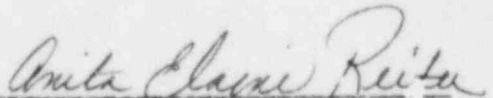
cc: Mr. R. DeYoung, Director (3) (w/a)
Ms. M. Ley, Project Manager (w/a)
Mr. E. A. Licitra, Project Manager (w/a)
Mr. G. Walton, NRC Resident Inspector (w/a)
INPO Records Center (w/a)
NRC Document Control Desk (w/a)

SUBSCRIBED AND SWORN TO BEFORE ME THIS
19th DAY OF October, 1984.

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

COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF ALLEGHENY)

On this 19th day of October, 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.


Notary Public

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