



# Duquesne Light

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October 26, 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. 50-412/84-09

Gentlemen:

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

## Notice of Violation

As a result of the inspection conducted on July 24 through August 24, 1984, and in accordance with the NRC Enforcement Policy (10CFR2, Appendix C) published in the Federal Register on March 8, 1984 (49FR8583), the following violation was identified:

10CFR50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by procedures and shall be accomplished in accordance with these procedures.

Specification 2BVS-981 contains in-place storage requirements for the Personnel Air Lock to prevent damage. After the doors are opened, this includes protection of door seals and sealing surfaces and support of the doors to prevent sagging.

Contrary to the above, during the period from July 26 until August 23, 1984, protection of the Personnel Air Lock was not provided to prevent damage of sealing surfaces or support of the doors to prevent sagging.

## Corrective Action

The following actions have been taken in regards to the Personnel Air Lock:

1. N&D-4691 was issued on August 22, 1984, to obtain an Engineering evaluation of the situation. It was dispositioned on September 12, 1984, providing an itemized list of maintenance required when the door was left open for extended periods of time.
2. E&DCR-2PS-3633 was issued on August 23, 1984, to change specification 2BVS-981. This now permits the door to be open with the approval of the Superintendent of Construction and adds new storage maintenance requirements.

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3. To prevent damage to the air-lock door seals and sealing surfaces, while the doors are open, temporary protective coverings and ramps have been installed. The doors are shimmed to prevent sagging.
4. A weekly inspection of the air-lock by the installing contractor was begun on August 31, 1984, to monitor its condition while the doors remain open.

These actions have brought the condition of the doors into compliance, and will ensure continued compliance.

#### 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 overflow 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 overflow. 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.

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 overflow. 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 overflow. These procedures include a checklist which will accompany all new computer overflow 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 BVPS-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). Nonconforming conditions will be documented by SQC and formally dispositioned by SWEC engineering. It should be noted that the raised covers can accommodate fills up to 2 inches above the side rail. The 1/2 inch margin may be used to prevent the need to remove cable in nonconforming installations.

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 of commitments. 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. A change to the FSAR has been generated and will be incorporated in a future amendment to the FSAR. As previously stated, the modified tray installation can accommodate overfills up to 2 inches above the tray side rails. Although design criteria and field construction procedures will limit installations at 1-1/2 inches above the side rail, the 1/2 inch margin may be used to accept field nonconformances between 1-1/2 and 2 inches upon proper engineering evaluation.

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

SUBSCRIBED AND SWORN TO BEFORE ME THIS  
26th DAY OF October, 1984.

Anita Elaine Reiter  
Notary Public

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

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

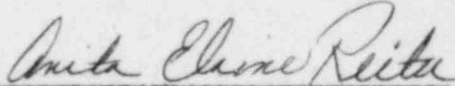
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cc: Mr. R. DeYoung, Director (3)  
Ms. M. Ley, Project Manager  
Mr. E. A. Licitra, Project Manager  
Mr. G. Walton, NRC Resident Inspector  
INPO Records Center  
NRC Document Control Desk

- REFERENCES: 1) NRC Inspection Report 84-09 to Mr. E. J. Woolever dated September 20, 1984
- 2) 2BVSU-34, 288-DILN from Mr. C. R. Bishop to Mr. R. J. Swiderski dated October 18, 1984
- 3) 2DLS-23155, dated October 22, 1984

COMMONWEALTH OF PENNSYLVANIA )  
                                          ) SS:  
COUNTY OF ALLEGHENY              )

On this 26th 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