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September 14, 1984

U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Attn: Mr. Thomas T. Martin, Director  
Division of Engineering and Technical Programs  
Region 1  
631 Park Avenue  
King of Prussia, PA 19406

Reference: Beaver Valley Power Station, Unit No. 1  
Docket No. 50-334, License No. DPR-66  
Inspection Report 84-02

Gentlemen:

Inspection Report 84-02 forwarded a Notice of Violation concerning the lack of controls for the Ten-Year ISI Plan for Beaver Valley Unit 1. In the April 12, 1984 reply to this violation (84-02-01) a Plan of Action was presented which culminated in a September 15, 1984 submittal of a controlled and approved Ten-Year ISI Plan.

We wish to inform you that several delays have occurred in implementing our action plan. These delays have impacted our anticipated completion date of September 15, 1984.

Attached is a status for the Plan of Action items originally submitted. The initial assessment of the work scope has been completed. This assessment revealed that the scope of work is significantly larger than anticipated. As a first step, applicable administrative and implementing procedures have been prepared and are expected to be approved and in effect by October 15, 1984. These new procedures will be used to control inspections during the Fourth Refueling Outage (4R).

However, due to the unanticipated increase in the scope of work, a DLC-controlled Ten-Year ISI Plan cannot be compiled at this time. An inspection plan for those items requiring inspection during the 4R has been generated by Duquesne Light Company. This 4R inspection plan will receive appropriate review and approval prior to implementation. The information

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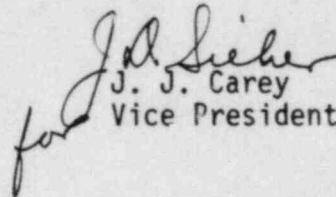
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obtained during 4R will be incorporated into the compilation of the DLC-controlled Ten-Year Plan. This document will be completed and approved prior to the Fifth Refueling Outage.

Therefore, we respectfully request an extension until October 15, 1984 for the completion of reviews and procedures and until the beginning of the Fifth Refueling Outage for completion and submittal of an approved DLC-controlled Ten-Year ISI Plan.

If you have any questions concerning this request, please contact my office.

Very truly yours,

  
J. J. Carey  
Vice President, Nuclear

Mr. W. M. Troskoski, Resident Inspector  
U. S. Nuclear Regulatory Commission  
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## Status

### Plan of Action for Ten-Year ISI Plan

#### A. Existing Ten-Year ISI Plan

1. The vendor's revised and updated Ten-Year Plan has been obtained.

#### B. DLC Management

1. A Nuclear Group Directive (NGD 25) has been written and approved delineating the guidelines for the administration of the BVPS Unit #1 ISI Program (excluding Pumps and Valves).
2. Proposed revisions to the existing Directives (NGD 2 & 10) to reflect the requirements of the ISI Program have been prepared for review and issuance.
3. A draft revision to the QA Manual (OP-11) to reflect the administrative scope of the ISI Program described in Nuclear Group Directive 25 has been prepared for review and approval.
4. Approval of the finalized DLC-controlled Ten-Year Plan and submission to the NRC will occur prior to the Fifth Refueling Outage.

#### C. DLC-Controlled Ten-Year ISI Plan

1. A unique controlled set of isometric drawings which reflect plant modifications has been completed. Review and correction of inconsistencies is ongoing and will be complete by October 15, 1984.
2. The review of plant modifications relevant to Class I, II, and III piping to ensure their inclusion into the DLC Ten-Year Plan is complete.
3. Implementing procedures have been drafted for the administrative control of the Ten-Year ISI Plan. These procedures are expected to be reviewed and approved by October 15, 1984.
4. Compilation of the DLC-controlled Ten-Year ISI Plan is in progress. The scope of the work is larger than originally anticipated and the task of integrating the vendor's information (used as an information source) is extremely time consuming since it must be translated into DLC format for purposes of document control.

An inspection plan for those items requiring inspection during the Fourth Refueling Outage has been generated by DLC. This plan encompasses those inspections required by the Code.

5. The 4R inspection plan will receive appropriate review and approval prior to implementation.