

SEP 20 1985

Docket No. 50-412

Duquesne Light Company  
ATTN: Mr. J. J. Carey  
Vice President  
Nuclear Group  
Post Office Box 4  
Shippingport, Pennsylvania 15077

Gentlemen:

Subject: Inspection Report No. 50-412/85-14

This refers to your letter dated September 6, 1985, in response to our letter dated August 6, 1985.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:  
Jacque P. Durr



Stewart D. Ebnetter, Director  
Division of Reactor Safety

cc:

E. J. Woolever, Vice President, Nuclear Construction Division  
E. Ewing, Quality Assurance Manager  
R. J. Swiderski, Manager, Startup Group  
R. E. Martin, Manager, Engineering  
E. F. Kurtz, Jr., Manager, Regulatory Affairs  
P. RaySircar, Stone and Webster Engineering Corporation  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
NRC Resident Inspector  
Commonwealth of Pennsylvania

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OFFICIAL RECORD COPY


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bcc:  
Region I Docket Room (with concurrences)  
Senior Operations Officer (w/o encl)  
DRP Section Chief  
T. Rebelowski, SRI, Millstone 3  
W. Troskoski, SRI, BV-1  
B. Singh, LPM, NRR

RI:DRS  
McBrearty/djh  
*RMB*  
9/18/85

RI:DRS  
Wiggins  
*RMB*  
9/18/85

  
RI:DRS  
Durr  
9/19/85



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September 6, 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. 50-412/85-14

REFERENCE: NRC Inspection 50-412/85-14, dated August 6, 1985

Gentlemen:

This is in response to the Notice of Violation cited in Inspection No. 50-412/85-14 and listed in Appendix A (Notice of Violation) attached to your letter to Mr. J. J. Carey, dated August 6, 1985.

Notice of Violation 85-14-01: "Insufficient Clearance Around Welds - PSI Related"

Violation:

10CFR50, 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, or drawings.

Specification 2BVS-920 requires that minimum longitudinal clear access equal to  $4 T_n + 2$ " be provided for welds which require surface or volumetric inservice inspection.

Contrary to the above, during the period from June 24-28, 1985, pipe support 2RCS-PSSP007X, reactor building elevation 783' 7-1/2", and pipe support 2RCS-PSR-036, reactor building elevation 783' 6" were found to obstruct 6" diameter shop weld A, line 2RCS-006-107-1, and 3" diameter weld 2RCS-109-F500, respectively, such that the required longitudinal minimum clear access was not provided for the welds.

Response:

As cited in this violation, minimum specified longitudinal access to the subject welds was not maintained when pipe supports 2RCS-PSSP-007X and 2RCS-PSR-036 were installed. FCP-208, "Control of Fabrication and

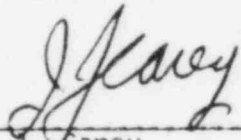
*Dupe 8509170182*

Installation Processes for Piping Systems," identifies access requirements and the need to obtain Engineering resolution when access could not be maintained. A review of FCP-207, "Component Support Control," indicated that this FCP had not identified such requirements. To strengthen DLC's program, FCP-207 will be revised to include these requirements/procedures, and necessary training of personnel will be completed by September 30, 1985. The FCP-207 revision, 2BVS-920 revision, and SQC Inspection Plans 7.2 and 7.3.1, which have already been revised to change inspection attributes for minimum clear access to welds, should prevent recurrence of any similar problem. In addition, the preservice inspection plan will include an appropriate attribute to assure that the spatial envelope is acceptable for each weld requiring inspection prior to performing the initial PSI.

In regards to the related Unresolved Item 85-14-02, the project is evaluating existing procedures to determine what additional measures are required to ensure all discipline installation activities are completed without adversely affecting the weld accessibility envelope. The results of this evaluation will be made available to the NRC Senior Resident Inspector upon request.

DUQUESNE LIGHT COMPANY

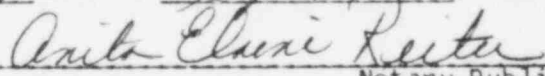
By

  
\_\_\_\_\_  
J. J. Carey  
Vice President

SDH/wjs

cc: Mr. J. M. Taylor, 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  
6th DAY OF September, 1985.

  
\_\_\_\_\_  
Notary Public

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

COMMONWEALTH OF PENNSYLVANIA )  
  )  
COUNTY OF ALLEGHENY            )

SS:

On this 6th day of September, 1985, before me, a Notary Public in and for said Commonwealth and County, personally appeared J. J. Carey, 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 Reiter  
Notary Public

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