



Duquesne Light

Nuclear Construction Division
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October 10, 1985

United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

ATTENTION: Mr. Edward C. Wenzinger, Chief
Projects Branch 3
Division of Reactor Project

SUBJECT: Beaver Valley Power Station - Unit No. 2
Docket No. 50-412
USNRC IE Inspection Report 50-412/85-16

Gentlemen:

In a letter to Mr. J. J. Carey dated September 10, 1985, Region I transmitted a Notice of Violation as Appendix A. This is Duquesne Light Company's response pursuant to the requirements of 10CFR2.201 and that Notice of Violation.

Notice of Violation:

10CFR50, Appendix B, Criterion XVI requires that measures be established to assure that ... nonconformances are promptly identified and corrected.

Contrary to the above, as of August 5, 1985, the licensee had not established and implemented a program to assure that nonconformances are promptly corrected. As a result, nonconformances remained outstanding on Nonconformance and Disposition (N&D) and Construction Deficiency Reports (CDR) for such extended periods of time that potential damage has occurred to components and materials may have been installed before corrective actions occurred. For example, N&D 6758 issued May 26, 1983, identified that non-approved fluorescent tape applied to the surfaces of stainless steel piping potentially contained chlorides, halogens, and sulfur. Although disposition of this N&D on June 30, 1983, required the tape to be removed and the areas buffed to remove possible surface contaminants followed by washing with demineralized water to remove residuals, as of July 18, 1985, no such corrective actions had been taken. In another example, N&D 2009 issued February 24, 1982, identified angle iron containing laminations and scabs. This N&D was not dispositioned for corrective action as of August 2, 1985, and as of August 6, 1985, this material could not be located and may have been installed without any corrective actions being taken.

This is a Severity Level IV Violation (Supplement II).

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Response

The project's program for closure of N&D Reports has been as follows:

- ° An N&D is issued by SQC, entered into Exception Work Tracking (FCP-29), and assigned to an applicable system or area release.
- ° The N&D is reviewed by Stone & Webster (S&W) Engineering and a priority for disposition is established based upon urgency (e.g. to support turnover, release materials from hold, etc.)
- ° The applicable contractor completes the closure actions with priority based upon system and/or area turnover schedule and testing requirements following turnover.

CDRs have been closed in a similar manner but without engineering review. This approach to N&D and CDR closure has been determined to be the most efficient to meet all project requirements. N&D and CDR closure is monitored by the various organization managers and action taken as appropriate.

To strengthen our program, the following actions have been or will be taken to ensure those conditions which require expeditious correction are assigned appropriate priority:

- ° The S&W Superintendent of Engineering has issued a directive to his personnel to identify N&Ds which require expeditious closure to minimize the adverse effects of a potentially deteriorating condition. These requirements will be included in the next revision of 2BVM-218, "Handling of Nonconformance and Disposition Reports by Site Engineering Group" scheduled for November 1, 1985.
- ° DLC-SQC will advise S&W Engineering when those N&Ds identified by S&W Engineering as requiring expeditious closure have not been closed in a specified time. These conditions will also be brought to the attention of the DLC-QA Manager.
- ° The Mechanical and Electrical contractors have instituted measures to have all N&D: and CDRs reviewed and to have designated personnel expedite N&Ds requiring timely closure.
- ° All N&Ds not closed are being reviewed by S&W Engineering and the Electrical and Mechanical Contractors in accordance with the above requirements to establish any revised priority for closure. This review will be completed by October 18, 1985.
- ° The Quality Improvement Management Program (QIMP) has been revised to include management reporting for N&Ds which will provide the document

status from initiation until closure. A corresponding CDR Status Report will be included in the QIMP monthly report for September.

For specific N&Ds cited in the subject violation, the following is provided:

- ° N&D-6758 has been closed utilizing the original disposition which has been reviewed and found satisfactory.
- ° N&D-2009 has been investigated and DLC has concluded that the stock angle steel could not have been installed with the condition cited (scabs and laminations) because FCP-804, "Inspection and Testing of Category I Coatings" requires all stock angle steel to be sandblasted and QC inspected prior to painting. Thus, any unacceptable conditions would have resulted in steel rejection. N&D-2009 has been voided.

DUQUESNE LIGHT COMPANY

By J. J. Carey
J. J. Carey
Vice President

RW/wjs

cc: Mr. B. K. Singh, Project Manager (w/a)
Mr. G. Walton, NRC resident Inspector (w/a)

COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF Allegheny) SS:

On this 10th day of October, 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