

JUL 27 1988

Docket No. 50-412

Mr. J.D. Sieber, Vice President
Duquesne Light Company
Nuclear Group
Post Office Box 4
Shippingport, Pennsylvania 15077

Dear Mr. Sieber:

SUBJECT: BEAVER VALLEY UNIT 2- CHEMICAL ADDITION PUMPS DEVIATION FROM ORIGINAL DESIGN SPECIFICATIONS (TAC 67833)

We have reviewed the information provided by your letter dated March 28, 1988 in which you advised the NRC of a deviation in your procurement of chemical addition pumps. Specifically, you plan to procure pumps without the "N" stamp.

It is our understanding that the chemical addition pumps will be procured to meet all the ASME Section III requirements, including all appropriate quality assurance requirements in NCA of Section III, with the exception of the "N" stamp. Also quality assurance requirements will comply with 10 CFR Part 50, Appendix B. As provided in the FSAR, the equipment is to be qualified for service and is to meet the requirements of IEEE 323-74 and IEEE 304-75. Duquesne Light is to implement surveillance requirements to periodically demonstrate operability, in accordance with the Inservice Testing Program. In addition, Gorman-Rupp Inc., the pump vendor, maintains a quality assurance program that meets U.S. Navy Nuclear Requirements and this program was applicable to design and fabrication of these pumps.

An exception to NRC requirements can be made in this case as a result of unique problems in procurement, and because only four small positive displacement pumps are involved. The following requirements are substituted for the independent (third-party) authorized nuclear inspector certification of the chemical injection pumps:

1. A licensed professional engineer should attest to the adequacy of construction of the pump. This engineer is to be knowledgeable in all aspects of construction (i.e., materials, design, fabrication, examination, testing and inspection) of the pump and not be associated with Beaver Valley Power Station or the pump vendor, but may be an employee of Duquesne Light Company.
2. The professional engineer should provide an information report that includes the same information required on "ASME Data Report Form NPV-1," except for the certificate of shop inspection and that portion of the certificate of compliance associated with the "N" stamp.

In addition, we have requested our resident inspectors to audit the procurement records upon completion of pump installation.

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Based on the above provisions, the deviation as described in your March 28, 1988 letter is acceptable. This review was performed by Mr. J. Rajan.

Sincerely,

Frank R. Oll for

Peter S. Tam, Project Manager
Project Directorate I-4
Division of Reactor Projects I/II

cc: See next page

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Mr. J. Sieber
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