

# Duquesne Light Company

Beaver Valley Power Station  
P.O. Box 4  
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JOHN D. SIEBER  
Vice President - Nuclear Group

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September 2, 1988

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

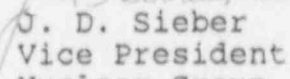
Reference: Beaver Valley Power Station, Unit No. 1  
Docket No. 50-334, License No. DPR-66  
Inspection Report 88-21

Gentlemen:

In response to NRC correspondence dated August 3, 1988 and in accordance with 10 CFR 2.201, the attached reply addresses the Notice of Violation included with the referenced inspection report.

If there are any questions concerning this response, please contact my office.

Very truly yours,

  
J. D. Sieber  
Vice President  
Nuclear Group

Attachment

cc: Mr. J. Beall, Sr. Resident Inspector  
Mr. W. T. Russell, NRC Region I Administrator  
Mr. William V. Johnston, Acting Director,  
Division of Reactor Safety  
Mr. P. Tam, Project Manager  
Director, Safety Evaluation & Control (VEPCO)

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DUQUESNE LIGHT COMPANY  
Nuclear Group  
Beaver Valley Power Station, Unit No. 1

REPLY TO NOTICE OF VIOLATION  
Inspection No. 50-334/88-21  
Letter dated August 3, 1988

VIOLATION (Severity Level IV, Supplement I)

Description of Violation (88-21-01)

10 CFR 50.49(f) requires that qualification of each component be based on testing or experience with identical equipment or with similar equipment with a supporting analysis to show that the equipment to be qualified is acceptable.

Beaver Valley site administrative procedure Chapter 31, Revision 2 Section 2a requires that equipment have sufficient documentation to establish that the equipment is environmentally qualified.

Contrary to the above on May 12, 1988, the equipment qualification file 0044 Revision 3 for motor operated valve MOV-SI-885B did not have sufficient documentation to establish the qualification of Ideal Model wirenuts utilized in the motor stator wiring circuit.

Admission or Denial of Alleged Violation

The violation is correct as stated.

Reason for Violation

During the performance of a routine Equipment Qualification (EQ) inspection in April, 1987 for motor operated valve MOV-SI-885B, a motor lead wire was found damaged and had to be repaired.

The maintenance instructions/procedures used for the EQ inspection did not specifically address the repair of the particular Limitorque wiring found to be damaged since this was not part of the preplanned inspection. Consequently, Maintenance obtained a wirenut which was stocked for use in safety related systems, but which was not approved for use in Electrical Equipment Qualification Master List (EEQML) equipment. Approved methods for reconnecting/splicing wiring in EEQML equipment were in existence at that time and should have been used.

DLC believes the major contributing factor to the occurrence of this violation was a weakness on the part of the Maintenance and Quality Control personnel involved in understanding a certain aspect of the EQ program. Namely, the introduction of any new or different materials into equipment on the EEQML requires specific prior approval by the Equipment Qualification Group.

Corrective Steps Which Have Been Taken and Results Achieved

The wire nut for valve MOV-SI-885B was replaced with a qualified compression crimp connector on May 12, 1988 via Maintenance Work Request 883020.

REPLY TO NOTICE OF VIOLATION

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To ascertain if the possibility existed of wirenuts being used in other EQ MOVs, a search of Maintenance Work Requests that may have involved wiring changes to MOVs was performed. We also inspected an additional 43 operators including 21 equipped with dual voltage motors for the presence of splice connectors other than T&B compression crimp connectors. As a result of these efforts one other wirenut installation was found in MOV-SI-864A. This wirenut was also replaced with a qualified crimp connector on May 13, 1988 via Maintenance Work Request 883011.

Station procurement has removed wire nuts from stock for applications in safety related systems to preclude future misapplication of them in equipment on the Electrical Equipment Qualification Master List.

Maintenance supervisors have been instructed to perform a timely post maintenance review of EQ maintenance work requests prior to turning the equipment over to operations to assure the equipment has been properly repaired and restored. A repeat training review of EQ maintenance requirements was conducted for Electrical Maintenance personnel on August 16 and September 1, 1988, emphasizing that to preserve environmental qualification, particular attention must be made not to introduce unqualified materials into the equipment or its interfaces which have been qualified. An 8 hour EQ seminar for Quality Control inspectors and supervisors and Electrical Maintenance and Construction supervisors was given on August 17 and 18, 1988. This additional training has resulted in a better understanding and heightened awareness of the combined effort required by Maintenance, Quality Control and Engineering to preserve the environmental qualification of the equipment.

Corrective Steps Which Will Be Taken to Avoid Further Violations

A review of Maintenance procedures is being conducted to identify any special requirements for qualified spare parts to preserve the qualification of the Limitorque Operators. This review will be completed by September 30, 1988.

Additional EQ retraining classes will be held for those Electrical Maintenance personnel who have been unable to attend these classes to date. We anticipate this will be completed by September 30, 1988.

The Date When Full Compliance will be Achieved

Full compliance has been achieved. As noted above, the review of maintenance procedures and retraining should be completed by September 30, 1988.