

APPENDIX A

NOTICE OF VIOLATION

Duquesne Light Company
Beaver Valley Power Station, Unit 2

Docket No. 50-412
License No. CPPR-105

As a result of the inspection conducted on December 15-19, 1986, and January 5-9, 1987, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violations were identified:

- A. 10 CFR 50, Appendix B, criterion XIII states in part that "measures shall be established to control the handling, storage, shipping, cleaning and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration."

Duquesne Light Company Electrical Installation Specification, 2BVS-931, Sections 1.16.16 states in part that "All covers, caps, plugs or other closures shall be intact. ----covers or closures removed----shall be promptly replaced.----preservatives and coatings shall be in place and intact. If reapplication is required only previously approved preservative material shall be used."

Duquesne Light Company Field Construction Procedure for Permanent Plant Cable Receiving, Storage, and Handling, FCP-430, Section 5.4.1 states in part that "All ends of insulated cable in storage ---- shall be sealed to exclude moisture and cut ends shall be immediately resealed. Cable sealing shall be by taping with waterproof tapes and painting taped seal with insulating varnish, General Electric Company 'Glyptal', 'Scotch IVI Spray Sealer'. Heat shrinkable caps or tubing of proper size may also be used for sealing."

Contrary to the above, a sample inspection of 50 cable reels in outside Storage Location "P" disclosed that 18 of the reels either had exposed cut cable ends with no protective cap or the tape was frayed or gaping open to expose the cable end to moisture. Painting of the taped seals with "glyptal" or any other protective varnish had been discontinued.

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

- B. 10 CFR 50, Appendix B, Criterion X states in part that "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures and drawings for accomplishing the activity. Such inspections shall be performed by individuals other than those who performed the activity being inspected."

Duquesne Light Company Site Quality Control Procedure No. SQC-5.2 "Storage Inspection Program - Designated Storage Areas" paragraph 1.1 states in part that "This procedure shall establish methods by which SQC shall verify compliance with Project Engineering requirements for designated storage facilities and for items stored in these areas."

Contrary to the above, Duquesne Light Company SQC Inspection Procedure, "IP-5.2. currently in use for audit inspections of the outside cable storage area "P" does not provide sufficient visibility of the overall storage area to detect gross breakdowns in protection of the stored cable since it requires inspection of only one type of cable per inspection period.

This was confirmed by a review of recent Duquesne Light Company inspection of Storage Location "P" using SQC-IP-5.2 as the reference inspection procedure. Inspection reports reviewed include MC-5394 dated September 17, 1986 and MC-5462 dated October 30, 1986.

This is a Severity Level IV violation (Supplement II)

Pursuant to the provisions of 10 CFR 2.201, Duquesne Light Company is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.