

AUG 19 1987

Docket No. 50-412

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

Gentlemen:

Subject: Inspection No. 50-412/87-20

This refers to your letter dated July 24, 1987, in response to our letter dated June 16, 1987.

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:

for *Jack R. Stromula*

William V. Johnston, Acting Director
Division of Reactor Safety

cc w/encl:

J. D. Sieber, Vice President, Nuclear
J. Crockett, Senior Manager, Nuclear Operations
E. Ewing, Quality Assurance Manager
R. J. Swiderski, Manager, Startup Group
J. P. Thomas, Manager, Engineering
R. E. Martin, Manager, Regulatory Affairs
C. O. Richardson, 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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Q PDR

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08/18/87

bcc w/encl:
Region I Docket Room (with concurrences)
Management Assistant, DRMA (w/o encl)
DRP Section Chief
J. Beall, SRI, BV-1
P. Tam, LPM, NRR
T. Martin, DRSS
S. Ebnetter, DRS
A. Lodewyk, DRS
Robert J. Bores, DRSS

RI:DRS
Gray/mk
E/mk.
8/19/87

 RI:DRS
Strosnider
8/19/87

~~RI:DRS
Durr~~

~~8/18/87~~

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08/18/87



Duquesne Light

Beaver Valley No. 2 Unit Project Organization
S.E.G. Building
P.O. Box 328
Shippingport, PA 15077

(412) 643-5200
Telecopy (412) 643-5200 Ext. 160

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

ATTN: Mr. William V. Johnston, Acting Director
Division of Reactor Safety

SUBJECT: Beaver Valley Power Station Unit No. 2
Docket No. 50-412
Inspection Report 50-412/87-20

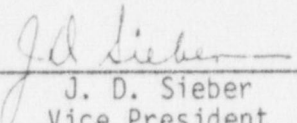
REFERENCE: 1) Letter dated June 16, 1987, (W. V. Johnston to J. J. Carey)

Gentlemen:

The above referenced letter transmitted a Notice of Violation as Appendix A. Attachment 1 of this letter provides Duquesne Light Company's (DLC) response pursuant to the requirements of 10CFR2.201 and the NRC's Notice of Violation. As requested in your letter, our response focuses on corrective actions taken to avoid similar problems in the future.

DUQUESNE LIGHT COMPANY

By


J. D. Sieber
Vice President
Nuclear

DLC/ijr
NR/DLC/IR/8720
Attachments
AR/NAR

cc: Mr. P. Tam, Project Manager (w/a/s)
Mr. J. Beall, NRC Sr. Resident Inspector (w/a/s)
Mr. L. Prividy, NRC Resident Inspector (w/a/s)
INPO Records Center (w/a/s)
NRC Document Control Desk (w/a/s)

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United States Nuclear Regulatory Commission
Mr. William V. Johnston, Acting Director
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bcc: J. J. Carey	- w/attachment
C. E. Ewing	- w/attachment
J. A. Hultz	- w/attachment
R. J. Druga	- w/attachment
K. D. Grada	- w/attachment
T. P. Noonan	- w/attachment
M. J. O'Neill	- w/attachment
S. C. Fenner	- w/attachment
C. Richardson (S&W)(5)	- w/attachment
J. Sutton (S&W)	- w/attachment
A. A. Dasenbrock, SWEC	- w/attachment
R. Anstey, SWEC	- w/attachment
R. Wittschen, SWEC	- w/attachment
J. M. Grigsby (<u>W</u>)	- w/attachment
C. Majumdar	- w/attachment
BV-2-NCD-SEG/Phase II PUC Audit	- w/attachment
Distribution PDR-378 (4)	
Inspection 87-20 File	- w/attachment
NCD File	- w/attachment

ATTACHMENT 1

VIOLATION 87-20-01

The Notice of Violation states, in part:

10CFR50, Appendix B, Criterion X states in part "A program for inspection of activities affecting quality shall be established and implemented by or for the organization performing the activity to verify conformance with the documented instructions procedures, and drawings for accomplishing the activity. . . .

During the NRC inspection conducted between March 16 and 26, 1987 the following examples of failure to implement quality control procedures affecting safety related inspections were identified. . .

. . . . This is a Severity Level V Violation.

Response:

As noted in Mr. W. V. Johnston's letter which accompanied the report, the 12 examples of minor problems identified by the NRC were corrected during the course of the inspection.

We concur with the NRC assessment that several of these problems may possibly be the result of unauthorized rework. In this regard, we wish to state that, with the onset of the Operational Phase, a revised method of controlling work has been placed into effect.

All construction work is presently authorized and controlled through a work package system which defines the areas, and the items in those areas which may be worked. Based upon our experience with this method of controlling work at BV-1, we believe that the possibility for unauthorized rework is greatly reduced.

The Director of Quality Control has issued a memo to all QC personnel, via training update, in which the aspects of Violation 87-20-01 are discussed. In this memo, the importance of maintaining diligence and attention to detail during inspections is emphasized. As it is the practice of DLC to engage QC inspectors who are certified in a number of activities, often in multi-disciplines, personnel have been directed to remain cognizant of their own limitations in recalling details applicable to a variety of inspection procedures.

Procedure SQC-1.4, which provides instruction for the issue and control of QC procedures, permits controlled copies of individual procedures to be issued to inspectors for reference in the field. Personnel have been encouraged to use this program to frequently refer to the text of the inspection procedure during the course of each inspection.

Our QA Auditing Group has endeavored to be responsive to NRC comments and suggestions which have been expressed during Inspections 86-47, 87-02, 87-03 and in the recent SALP Report.

In our response to the SALP Report, we outlined three plans of action which are being implemented to improve our QA program.

Our development of recent audit plans has emphasized increased involvement with the process and physical performance of the audited activity. It is our intention to maintain this emphasis and to continue to look for new ways to enhance and improve the effectiveness and benefits of our auditing program.