



Duquesne Light

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August 14, 1980

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

Attention: Mr. Boyce H. Grier, Director

Subject: Beaver Valley Power Station, Unit No. 1
Docket No. 50-334
Response to IE Bulletin 79-14 (Interim Report)

Dear Mr. Grier:

In accordance with IE Bulletin 79-14 dated July 2, 1979, Revision 1, dated July 18, 1979, and Supplements 1 & 2 dated respectively August 15 and September 7, 1979 we are submitting herewith an interim report for the results to date, and a schedule for completion of all remaining tasks.

The primary purpose of the task undertaken to comply with the subject bulletin was to assure that the as-built condition of Beaver Valley Unit No. 1 (BV-1) piping and supports agreed with the analytical models. In our letter of September 27, 1979 we estimated that this task would be completed by May, 1980. This has turned out to be unrealistically optimistic due to a number of factors. The amount of work involved in reanalyzing the computer analyzed large bore piping required by the Show Cause Order to include the effects of the OBE was greater than originally estimated. In order to complete this activity, it was necessary to utilize the same personnel needed to review the results of the as-built inspection related to IEB 79-14. This delayed the start of the review and slowed general progress. The field inspection schedule was affected by the heavy workload placed upon the required radcon personnel due to the large amount of concurrent maintenance and construction activities. Also, the scope of inspection was expanded to include a reinspection of the Containment annulus pipe racks and other originally unanticipated inspections.

A summary and conclusion of results to date are provided in Attachment No. 1. The Stone & Webster report on the results of their review including the specific non-conformances identified is provided in Attachment No. 2. A schedule for the completion of work remaining to be accomplished under IEB 79-14 is provided on Attachment No. 3.

Item# 22

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We have completed the review of all piping isometrics associated with the computer analyzed large bore piping. This includes 96 piping isos and associated supports. Certain isometric drawings include more than one computer problem. There have been 263 modifications required, of which 233 consisted of shim corrections to pipe restraints in order to meet clearance criteria. It is probable that a more rigorous analysis could have eliminated many of the shimming modifications; however, the most expedient solution was to carry out the modification. A total of only three non-conformances were identified. The breakdown of the specific hanger modifications is indicated in Attachment No. 2.

A complete report of the results of the reanalysis and modifications of the computer analyzed large bore piping required by IE Bulletin 79-07 is being provided to NRR in accordance with the commitments made in our July, 1979 request to return the unit to operation on an interim basis in accordance with our Show Cause Order of March 13, 1979.

DLC decided to computer analyze all of the originally non-computer analyzed safety related piping primarily from 2 1/2 in. to 6 in. diameter utilizing the same design requirements as applied by Stone & Webster for the large bore piping. This was done as a result of a lack of supporting design information against which the as-built information could be compared. A total of 128 piping isometrics were analyzed, and for pipe supports and restraints, 538 have been reviewed out of 1314. The only supports remaining to be reviewed are outside of the containment.

For Class 1 small bore piping all supports have been analyzed and found to be acceptable. Supports for the SI lines have also been specifically evaluated and found satisfactory. All other safety related piping and supports inside the containment have been analyzed and modifications installed where necessary. The balance of the analysis for piping external to the containment will be completed by September 30, 1980. Should any overstress conditions be identified they will be evaluated and reported in accordance with IEB 79-14.

All piping inside the containment has now been completely inspected. Small bore piping (less than 2 1/2" diameter) outside of the containment and a few insulated supports are all that require verification for completion of this as-built inspection task. The field inspection of the small bore piping external to the containment that must be seismically supported will be completed by September 15, 1980.

In summary, with respect to the requirements of IEB 79-14, the following describes the present status of the seismically designed safety related piping systems at Beaver Valley Power Station, Unit No. 1:

1. All inspections of large and small bore piping (2 1/2" diameter and greater) have been completed.

2. All required modifications to the large bore piping will be completed prior to returning the unit to service later this month.
3. All required modifications to Code Class I small bore piping will be completed prior to returning the unit to service.
4. All required modifications to Safety Injection System piping (Code Class II) will be completed prior to returning the Unit to service.
5. The balance of the inspection work on seismically designed safety related small bore piping systems (less than 2 1/2") external to the containment will be completed by September 15, 1980. This basically covers branch lines (i.e. high point vents, drains, instrumentation). Several insulated hangers remain to be inspected outside of the containment.
6. Any modifications that are determined to be required for the small bore piping systems external to the containment will be scheduled to be performed consistent with safety consequences associated with the safety significance of identified overstress conditions.

We have determined that with the completion of the modifications referred to in items 2, 3, and 4, all piping systems installed in the Beaver Valley Power Station to prevent or mitigate the consequences of the postulated accidents and to place the unit in a safe shutdown condition will be able to perform their required safety functions during and subsequent to an occurrence of a seismic event as described in the Final Safety Analysis Report for the facility.

DUQUESNE LIGHT COMPANY


By



E. J. Woolever
Vice President
Engineering & Construction

(CORPORATE SEAL)

Attest:




Joan S. Sencyszyn
Assistant Secretary

Mr. Boyce H. Grier, Director
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COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF ALLEGHENY)

On this 15th day of August, 1980, before me,
HENRY G. STOECKER a Notary Public in and for said
Commonwealth and County personally appeared EARL J. WOOLEVER who, being
duly sworn, disposed and said that (1) he is Vice President of Duquesne
Light Company, (2) he is duly authorized to execute and file the foregoing
Report on behalf of said Company, and (3) the statements set forth in the
Report are true and correct to the best of his knowledge, information, and
belief.

WITNESS my hand and seal the day and year first above written.



HENRY G. STOECKER, Notary Public
Pittsburgh, Allegheny County, Pa.
My Commission Expires
February 20, 1982

Attachments

cc: United States Nuclear Regulatory Commission
Director of the Office of Inspection and Enforcement
Washington, D.C. 20555

United States Nuclear Regulatory Commission
Director of the Division of Reactor Operations Inspection
Washington, D.C. 20555

D. H. Beckman
Beaver Valley Power Station Office Building