

Docket No. 50-334

April 2, 1980

Memorandum for: E.C. McCabe, Chief, Reactor Projects Section No. 2,
RO&NS Branch, RI

From: D.A. Beckman, Sr. Resident Inspector, BVPS-1

Subject: BEAVER VALLEY POWER STATION, UNIT 1 - LICENSEE'S
REQUEST FOR SCHEDULE RELIEF ON IEB 79-14

On March 31, the DLC Superintendent of Licensing and Compliance requested the Region I position regarding a further extension of the facility's schedule for completing the requirements of IEB 79-14, Seismic Analyses for As-Built Safety-Related Piping Systems. The licensee's current commitment, forwarded to Region I via a DLC letter dated October 30, 1979, committed to completion of all inspection and engineering activities, including required modifications prior to the scheduled July 22, 1980 plant restart. The requirement for full completion was confirmed by a Region I letter, B.H. Grier to C.N. Dunn, dated November 1, 1979.

The licensee's current assessment of progress on the bulletin's requirements indicates that all field inspections will be complete on about June 2, 1980. Due to a shortage of piping analysis manpower in the various DLC consultants' organizations, the licensee's Mechanical Engineering Department has stated that completion of the engineering review of the field inspection results by qualified piping analysts and performance of any required reanalysis will not be complete prior to December 1980. Preliminary information from the licensee indicates that any system modifications which are required as a result of such reanalysis may extend beyond the December 1980 time frame.

During a telephone conversation with R. Woodruff, IE:HQ, on March 31, I was informed that such shortages of analytical manpower are not atypical and that any request for relief should be accompanied by sufficient information to substantiate the manpower problem and clearly define any potential safety impact. We also discussed the relationship of the IEB 79-02, IEB 79-14, and Show Cause Order efforts and the potential conflicts which could arise with late identification of as-built deficiencies which affect the SSE reanalysis which is currently being performed pursuant to the March 13, 1979 Show Cause Order.

I have informed the DLC Superintendent of Licensing and Compliance that we would entertain a request for relief on the basis that a negligible impact on safety could be demonstrated and that any potential conflict with other seismic analysis activities can be positively reconciled. I am not confident that such results can be demonstrated based on their current program status.

On April 1, I reviewed the status of the field inspection and modification program. Based upon fairly complete scheduling data, it appears that all field inspections will be done prior to June 2. To date 169 isometric drawings have been verified with numerous dimensional discrepancies and minor hardware discrepancies that imply the potential for numerous reanalyses and modifications. To date, only 10 such discrepancy reports have been returned to the plant by the AE for modification. Although

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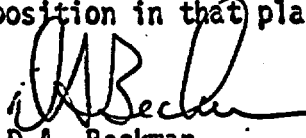
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most of the discrepancies which I reviewed involved minor dimensional problems, these appear so numerous as to indicate large numbers of future modifications. I have requested DLC to provide additional detail on their plans for prompt, priority review of such items.

Based on the foregoing, I have prepared the list of information items (attached) which I feel should be addressed by the licensee's request for relief. Although I acknowledge that the list will require the licensee to provide extensive detail on program status, their prior performance with regard to implementation of IEB 79-14 has not been satisfactory (Reference: Memoranda to File, dated September 28 and October 2, 1979 and the docket correspondence re IEB 79-14).

Please provide your comments and/or recommendations with regard to the attached and our intended disposition of the licensee's impending request. I have informed the licensee that our tentative position will be made available to them as soon practicable and within the week if possible in that DLC is currently performing an outage schedule revision and would like to incorporate our position in that planning.


D.A. Beckman
Sr. Resident Inspector
BVPS-1

cc: E. Greenman
L. Tripp
E. Brunner

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Any submittal requesting schedule relief should include substantiation that the extrapolated results of the inspections and evaluations completed indicate that only a few nonconformances will be found in the remaining systems or inspection packages. Conclusions must be substantiated by data in the submittal which presents the detailed results to date and should quantitatively establish that the likelihood of a complete system, that is both trains of a system, being found inoperable is negligible.

The submittal should include the scope of inspections and/or evaluations which will not be completed prior to plant restart in the form of a listing by system or train and the effect of piping/component failure on the system or plant.

Data submitted should include the results of analytical evaluations made to date and an itemized evaluation of all yet-to-be analyzed inspection findings based upon qualified engineering judgement.

The submittal should describe the impact of incomplete inspections or evaluations upon the "Show Cause Order" reanalysis requirements and the IEB 79-02 requirements. It should include the plans for reconciling nonconformances which impact either of the other two efforts.

The submittal should describe the intended schedule for activities which are to be completed prior to plant restart, activities which are to be completed after plant restart, commitment dates for submittal of status reports and the final report, and an assessment of schedule achievability based on available resources.

Information copies of all submittals made pursuant to IEB 79-14 or related commitments should be sent to the Director, OIE and the DOR Project Manager.

The submittal should individually address the scope and status of all modifications identified as necessary by completed inspections and evaluations, the intentions for implementing modifications identified subsequent to plant restart, and the information requirements of Paragraph 4.A through 4.C of IEB 79-14, dated July 2, 1979.

The submittal should include a commitment for action similar to:

If the seismic qualification of any safety related system or component is found to be improper, the plant will be placed in the cold shutdown condition either within seven days of identification of any such uncorrected item or as specified in the Technical Specifications, whichever is less. Should such a shutdown occur, the facility will remain in cold shutdown until corrective action on the identified equipment is completed. Any such deficiencies will be reported as required by Technical Specifications.