



**Duquesne Light**

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United States Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Attn: Boyce H. Grier, Regional Director  
Region I  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Reference: Beaver Valley Power Station, Unit No. 1  
Docket No. 50-334, License No. DPR-66  
Interim Report on IE Bulletin 79-14

Dear Mr. Grier:

As a result of a commitment to the NRC Resident Inspector associated with Inspection Report 79-27, this submittal is made to clarify Duquesne Light Company actions and plans with regard to IE Bulletin 79-14.

As has been stated in previous correspondence and discussions, Duquesne Light Company's current effort is directed toward completing inspection of all piping not previously inspected and subject to the Bulletin in full compliance with the requirements of the Bulletin.

Prior to issuance of the Bulletin, verification of the accuracy of "as built" drawings of the Containment Annulus and Cable Vault CVRK Racks were undertaken in response to the March 13, 1979, show cause order. Since this verification effort preceded the issuance of the Bulletin, NRC inspection criteria were not available. However, informal but detailed instructions were developed by Stone and Webster and were provided to those personnel making the inspection.

The results of the drawing verification effort are being compared against the basis of the seismic reanalysis by experienced pipe stress and supports engineers familiar with the work to date. These engineers assess the impact of noted deviations between the "as built" condition and the "as analyzed" condition. When significant deviations arise as a result of this review, the problem is recoded into NUPIPE using the configuration on the field walked isometric, and reanalyzed.

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The results to date have indicated very good correspondence between the original "as built" drawings and the as installed systems. We plan to continue to evaluate the results of the current Duquesne "as built" inspection program. If the evaluation of the current "as built" inspection program continues to indicate satisfactory conformance between the "as built" and "as analyzed" conditions, then we will consider that the entire "as built" drawing verification program is satisfactory. However, if the current inspection program does not yield satisfactory results, the CVRK and Annulus Racks will be reinspected.

Very truly yours,

*C. N. Dunn*

C. N. Dunn

Vice President, Operations

Beaver  
Valley 1

7/30/79

(1) Scope of inspection not clear. Their Category "B" is not acceptable - all piping, including 2½"-6", should be inspected. Embedments should be inspected - they say they want to look at them.

DLC letter dated 9/27/79 states that the inspection program will include piping 2½" diameter and larger. The systems listed in "Category B" of DLC response dated 7/30/79 are to be included.

9/11/79

(2) Only 2½" and above piping computer analyzed (Group 3) partially analyzed. No results. They should do all Group 2 and 3.

All safety-related lines 2½"-6" diameter will be inspected (see Item 1 review). This will include all branch lines, safety-related or not, which can impose significant stresses on the safety-related lines.

9/27/79

(3) State they will comply with bulletin on extended schedule. They should do all piping inside containment regardless of results. Also, are 1976 "as-built" drawings the design drawings? Why?

The extended schedule is discussed in 9/27/79. Letter is further discussed a DLC letter dated 10/30/79 and an NRC letter dated 11/1/79 (extension granted to 12/17/79 - Inspection and report due prior to operation). It appears the licensee's position regarding only limited inspection of piping in containment remains as stated in the last paragraph of the 9/27/79, although the DLC submittal dated 10/30/79 appears to state differently in its third paragraph. Until 12/27, Region I understood that all piping in containment would be reinspected as part of the current inspection program. The licensee however, maintains that no additional piping will be inspected beyond that discussed in the 9/27/79 submittal. This matter is currently being pursued with DLC by Region I.

The 1976 "as built" drawings are not necessarily the "design drawings". These drawings are being used for the IEB inspections and were walked down and revised in 1976 as a result of field changes which affected the original design drawings' accuracy. No concerted effort has been made to verify if the "as built" changes shown on the drawing were incorporated into the original PIPESTRESS computer analyses. As a result of the 3/13/79 show cause order, the licensee is using/has used the 1976 "as built" drawings as the input for the 1979 reanalysis effort. This seems to result in these drawings becoming the design drawings of record for current acceptability of the systems. This may not necessarily apply to 2½" - 6" piping which was analyzed by hand calculations. The licensee is considering inputting

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(2)

REGIONAL FOLLOW-UP ON NRR COMMENTS

those problems in the NUPIPE program but has not made a final decision as yet. To date, the licensee has completely inspected about 60 isome and has partially inspected about 100 more. Based on DLC evaluation of the findings to date, no significant deviations have been identified. The deviations to date have been characterized as minor dimensional and hardware discrepancies.