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MEMORANDUM FOR: File

THRU: R. R. Keimig, Chief, Reactor Projects Section No. 1,
RO&NS Branch, Region I

FROM: D. A. Beckman, Reactor Inspector, RO&NS Branch

SUBJECT: BEAVER VALLEY POWER STATION UNIT 1 - RECORD OF TELECON
INADEQUATE LICENSEE RESPONSE TO IE BULLETIN 79-14

AKS
9/28/79

Review of Duquesne Light Company (DLC) letters, dated July 30 and September 11, 1979, which were submitted in response to IE Bulletin 79-14, resulted in the following Region I comments and questions. These items were discussed among D. A. Beckman, RI, R. Woodruff, IE:HQ, and R. LaGrange, NRR during informal phone conversations on September 19, 1979. Based on those discussions, H. Kister and D. Beckman of RI held a conference call on September 19, 1979 with Messrs. J. A. Werling, H. Williams, and R. Burski of the licensee's staff. The comments and questions below were presented to the licensee.

1. DLC 60 day IEB submittal dated 9/11/79 does not appear to comply with IEB requirements in that all inspections of accessible piping are not reported complete as required by paragraph 2 of the IEB nor are the results of the inspections which have been completed provided in the submittal.
2. In combination, the 30 day and 60 day IEB responses indicate that some type of sampling approach was used for that piping inspected to date. IE and NRR have established the position that sampling methods for these inspections are unacceptable and that all systems addressed in the bulletin must be completely inspected.
3. Discussions between D. Beckman and J. Carey, DLC, on September 18, have indicated that there are no inspections now in progress and that all or nearly all the "Group 2" small bore piping is yet to be inspected. IE and NRR have established the position that all accessible piping discussed in paragraph 2 of the IEB was to have been inspected within 60 days of the IEB date and if not complete should be in progress now. Further, the licensee has not submitted any deviations to the IEB's schedule for NRC evaluation.
4. The DLC 30 day submittal excludes embedments from inspection attributes which are considered as inputs to the seismic analyses. This appears to be inconsistent with the position taken by other licensees.

During the above call with the licensee, the plant staff was unable to respond to the Region I questions and stated that they would require referral to DLC Engineering. Mr. Beckman provided the following listing of items to the licensee which are to be addressed in a supplementary submittal for the IEB. Mr. Werling tentatively agreed to provide the requested information in writing to Region I within 14 days. Additional telephone communication was discussed as being necessary to ensure DLC understanding of NRC concerns.

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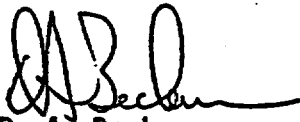
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The following information was requested:

- Results of completed inspections
- Status of completed vs. incomplete inspections including licensee's intentions for scope and schedule of incomplete inspections.
- Commitment to either perform 100%, non-sampling inspections in accordance with the IEB or to provide with the 14 day submittal sufficient statistical justification to allow staff evaluation of a sampling type program.
- If not already in progress, reinitiate inspections of the "Group 2" accessible piping as soon as possible.
- Discussion of the technical basis for excluding embedments as inspection attributes which includes a description of their treatment in the seismic analysis.
- Provide specific position on completion of all required inspections within the 120 day time frame of IEB including proposed schedule for completion.


D. A. Beckman
Reactor Inspector

cc:
R. Keimig
H. Kister
R. Woodruff, IE:HQ
R. LaGrange, NRR
L. Tripp ✓
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