



# Duquesne Light

435 Sixth Avenue  
Pittsburgh, Pennsylvania  
15219

(412) 471-4300

September 27, 1979

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 (60 Day Report)

Dear Mr. Grier:

Supplementing our response of September 11, 1979, (60 Day Report), we are transmitting herewith the information that was discussed between your Mr. Don Beckman and R. Burski and N. Tonet of Duquesne Light Company (DLC).

The information provided to you in the previous submittals indicated under the verification category by letter "A" those lines which had been checked as part of the Beaver Valley Power Station Unit 1 (BV-1) piping reanalysis effort. This verification included a sampling that covered approximately 50 percent of the piping isometrics that were dynamically analyzed as part of the BV-1 Show Cause Order. In addition the piping on the containment annulus pipe racks and the cable vault pipe racks were also verified, which included 2 1/2 inch and larger safety related piping.

It should be noted that we are verifying drawings that were specifically updated to "as-built" conditions in 1976. Thus for the interim it was determined that the balance of this effort could be delayed or omitted since no deviations were found that affected the seismic analysis.

Our intent at this time is to comply with the Bulletin. An inspection procedure and organization are being developed and will be inspecting the balance of the piping by the second week of October. This will include inspection of safety related piping 2 1/2 inches in diameter and larger. The schedule for this inspection effort is attached.

Item # 32

C/33

(3)

Mr. Boyce H. Grier  
Page 2


Included in the inspection procedure will be a requirement to check the dimensions of imbedded steel plates where used to support safety related piping.

As can be seen from the schedule we will not be able to meet the 120 day deadline. Therefore, we are requesting that an extension be granted to May 5, 1980 to complete this effort. BVPS Unit 1 will be shut down for a 36 week scheduled outage in November and therefore there is no reduction in the plant safety as a result of this schedule extension.

It should be noted that it is our intent not to pursue the as-built verification in the containment (beyond that done for the annulus racks) or other radioactively hot areas if the results of this verification effort are indicative of an adequate agreement between actual field conditions and the as-built drawings as has been found thus far.

If there are any questions, please advise.

Very truly yours,



C. N. Dunn  
Vice President, Operations

cc: United States Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Division of Reactor Operations Inspection  
Washington, D.C. 20555

JOB TITLE AS-BUILT DWG VERIFICATION

FILE NO. O.F.E. NO. 11959 EM 20178

LOCATION BIPS-UNIT 1

C.O./J.O. COMPILED BY: NRT

SUBJECT INSPECTION SCHEDULE

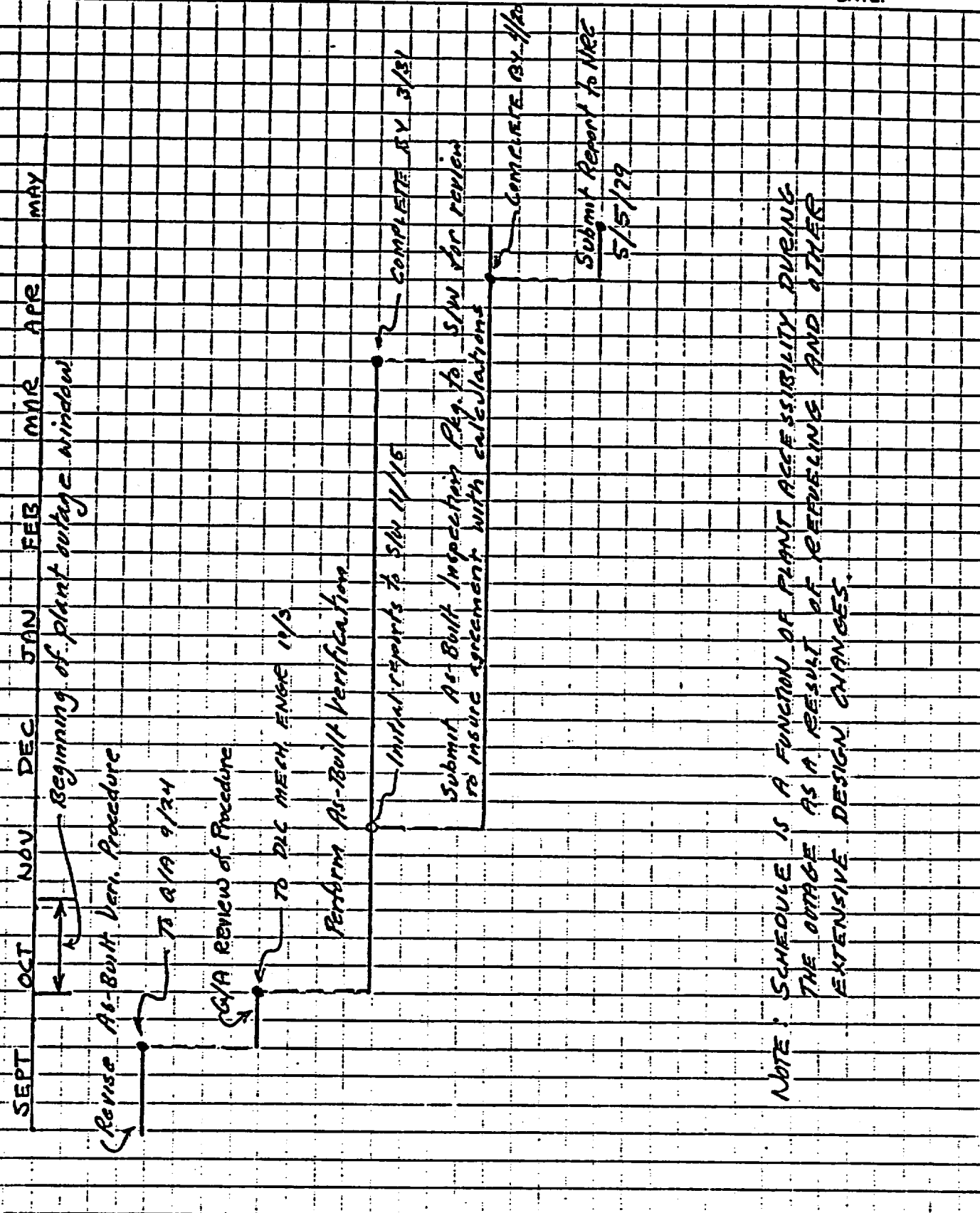
CHECKED BY: DATE: 9/17

DEPARTMENT MECH. ENGR

REVISOR BY: DATE:

DIVISION

REVISOR BY: DATE:



NOTE: SCHEDULE IS A FUNCTION OF PLANT ACCESSIBILITY DURING THE OUTAGE AS A RESULT OF REEVALUING AND OTHER EXTENSIVE DESIGN CHANGES.

JOB TITLE AS-BUILT DWG VERIFICATION

FILE NO. O.F.E. NO. 11959 EM 20178

LOCATION BIPS-UNIT 1

C.O./I.O. COMPILED BY: NRT

DATE: 9/17

SUBJECT INSPECTION SCHEDULE

CHECKED BY:

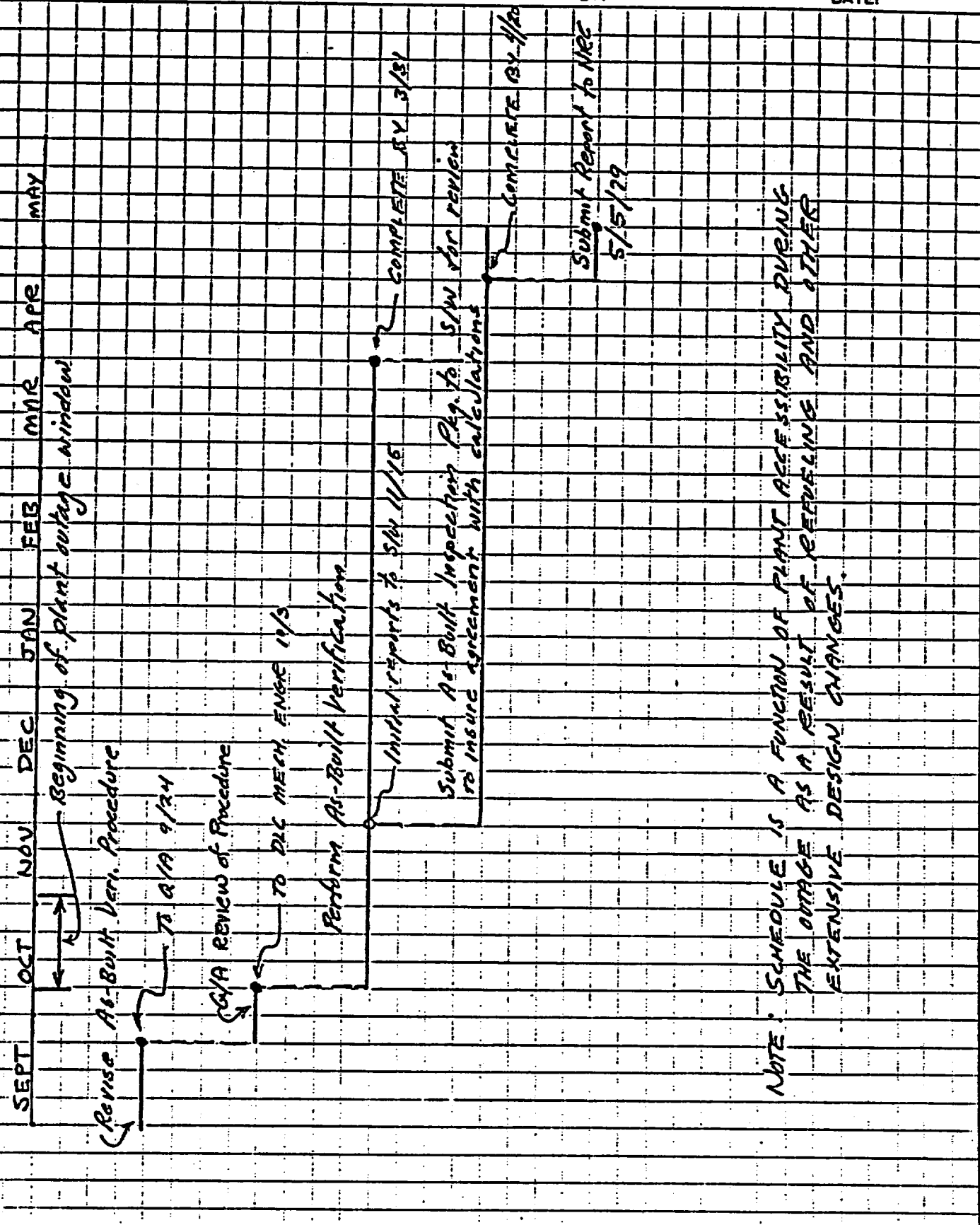
DATE:

DEPARTMENT MECH. ENGR

REVISED BY:

DATE:

DIVISION



NOTE: SCHEDULE IS A FUNCTION OF PLANT ACCESSIBILITY DURING THE OUTAGE AS A RESULT OF REFUELING AND OTHER EXTENSIVE DESIGN CHANGES.

--DRAFT--

L. TRIPP

FYI

Copy for File

Docket No. 50-334

Memorandum for: File

Thru: R.R. Keimig, Chief, Reactor Projects Section No. 1, RO&NS Branch

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

Subject: BEAVER VALLEY POWER STATION UNIT 1 - RECORD OF TELECON (9/20/79)  
INADEQUATE RESPONSE TO IE BULLETIN 79-14

Reference: Memorandum, D.A. Beckman to File, Record of Telecon (9/19/79),  
Same Subject

of Duquesne Light Co.

Messrs. R. Burski and N. Tonet telephoned D.A. Beckman on September 20, 1979

in followup to the referenced conversation of September 19. The purpose of the call was to verbally provide information which addressed the Region I concerns documented in the reference memorandum and to discuss the proposed content of a supplemental bulletin response which Messrs. Burski and Tonet are responsible for preparing.

The points clarified by Messrs. Burski and Tonet included:

- The licensee had suspended all inspections of accessible piping pursuant to IEB 79-14, paragraph 2. This was apparently due to a late realization that the July 18 supplement to the IEB included piping which had not yet been inspected (2½-6 inch).
- These inspections are in the process of resumption. Preparations ~~for~~ are in progress now and inspections will start during the week of September 24.
- The licensee acknowledged the NRC position that a sampling approach to the bulletin ~~approach~~ <sup>ACTIONS</sup> is unacceptable. Their plans now include 100% inspection of the piping subject to bulletin requirements. These inspections will likely be completed during the refueling outage (early November 1979 - early 1980).

W

Item # 34

C/34

(4)

--DRAFT--

They also agreed to provide <sup>an</sup>the updated submittal by October 3, 1979 which will address the information discussed above, scope and schedule for remainder of <sup>the</sup> inspections, and a request for relief from the 120 day completion date in the IEB. Since the schedule refueling outage begins at the very end of the 120 day period, the licensee intends to request relief such that all required inspections will be completed prior to restart from the outage.

D.A. Beckman  
Reactor Inspector.

cc:

R. Keimig  
H. Kister  
L. Tripp  
R. Woodruff, IE:TP  
R. LaGrange, NRR:EB  
D. Beckman  
RO&NS BVPS File

--DRAFT--

L. Trapp  
RC&ES  
Copy for Feil

Docket No. 50-334

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

u  
(DLC)  
Review of Duquesne Light Co. 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 <sup>on September 19, 1979</sup> 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.

IEB

1. DLC 60 day<sup>u</sup> 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<sup>IEB</sup> 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 <sup>between D. Beckman and</sup> with J. Carey, DLC, have indicated that there are no inspections now in progress and that all or <sup>on 9/17/79</sup> 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.

--DRAFT--

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.

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 <sup>ALL</sup> 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  
RO&NS BVPS File

Concurrences

Beckman/Kister/Keimig