



JUL 10 1981

4147

(412) 456-6000

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

ATTENTION: Mr. Boyce H. Grier, Director

SUBJECT: Beaver Valley Power Station Unit No. 2
Docket No. 50-412
USNRC IE Inspection Report No. 50-412/81-02

Gentlemen:

This is in response to the items of infraction cited in Inspection Report No. 50-412/81-02 and listed in Appendix A (Notice of Violation) attached to your letter to Mr. E. J. Woolever dated June 15, 1981.

NRC VIOLATION (81-02-01)

10 CFR 50, Appendix B, Criterion XIII, states in part, "Measures shall be established to control the handling, storage...to prevent damage or deterioration."

The Beaver Valley Power Station, Unit 2, PSAR Section 17, paragraph 17.2.1.13A, also states, "The DLC QAP establishes measures to control the handling, storage, shipping, cleaning and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration."

The Duquesne Light Procedure D.L.C. FCA-11, paragraph 8.6.3, states in part, "Material must be maintained as nearly as practical in its required storage level during transit" and S.I.C.P. 13.2, Revision 2, Level D states, "Reasonably removed from actual construction area and traffic..."

NRC VIOLATION (81-02-01)
(Continued)

Contrary to the above, on May 5, 1981, ASME Safety Related piping was temporarily stored in the cable vault area and on the ground outside the containment building without adequate protection from damage.

This is a Severity Level IV Violation (Supplement I.E.).

RESPONSE

This violation can be divided into two separate instances of failure to store material and/or equipment in accordance with established site procedures.

In consequence, the immediate corrective action relative to the occurrences reported were as follows:

- (a) The pipe found lying on the ground in an outside area, SWS-451-8, was immediately removed to a proper barricaded storage area on dunnage, as reported in the Inspection Report 50-412/81-02.
- (b) The piping stored inside the Cable Vault area has been subjected to repositioning and storing on proper dunnage as required by the existing procedures. This activity took a longer time to accomplish than the activity required by (a).

In both instances, the cause of the problem was the failure of site personnel to follow existing procedures relative to the storage of equipment inside and closely adjacent to permanent buildings. With reference to the latter incident, we can attribute the lack of adequate instructions to crafts, specifically when moving equipment that displaces existing stored equipment or materials, as being the initial cause of the condition.

With reference to long-term corrective action, we have reviewed our existing policies which have emphasized the Duquesne Light Site Quality Material Control Section's activities, and we have found that with one exception the conditions observed had been reported by them. It is our intention to continue these surveillance activities.

RESPONSE (Continued)

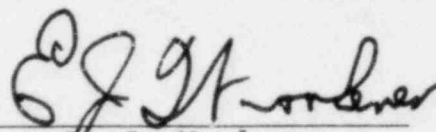
We have concluded, however, that effective corrective action must emphasize line organization conformance.

The first step in this approach has been taken by having S&W Construction Management, the Contractor's Project Managers, Officers of the Contractor's companies, and representatives of the Licensee's Quality Assurance Management address all general foremen and foremen on the site, emphasizing responsibilities and the project's determination to maintain the necessary storage requirements. It is our intention to hold discussions with all supervision on the site to similarly emphasize their responsibilities in this matter. The need for detailed instructions when equipment is moved into areas causing a displacement of existing stored equipment or material will be emphasized.

In order to provide continuity to this effort, a committee has been formed comprising of Project Managers of the three major contractors, General Superintendent of S&W Construction Management, and representatives of the Licensee's Construction and Quality Control Departments. This group will tour the site on a scheduled basis to demonstrate the Project Management's concern, identify potential future problem areas, and to initiate retraining and emphasis of certain attributes when considered necessary.

DUQUESNE LIGHT COMPANY

By


E. J. Woolever

cc: Dr. V. Stello (15)

Attest:

Thomas Welfer, Jr.
Secretary

COUNTY OF ALLEGHENY

HENRY G. STOECKER

My Commission Expires
February 20, 1982