



## Duquesne Light

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May 20, 1983

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

ATTENTION: Mr. Richard W. Starostecki  
Division of Project and Resident Programs

SUBJECT: Beaver Valley Power Station - Unit No. 2  
Docket No. 50-412  
USNRC IE Inspection Report No. 50-412/83-04

Gentlemen:

This is in response to the Item of Violation cited in Inspection Report No. 50-412/83-04 and listed in Appendix A (Notice of Violation) attached to your letter to Mr. E. J. Woolever, dated April 8, 1983.

### NRC VIOLATION (83-04-01)

10CFR50, Appendix B, Criterion V, states that activities affecting quality shall be prescribed by documented instructions of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions.

Chapter 17 of the PSAR, paragraph 17.1.1.4B states that quality requirements are established by the Stone & Webster Engineering Department for construction activities and they are included in specifications for their implementation.

Specification 2BVS-920 states that construction devices such as temporary supports may be used to support piping whenever piping installation is jeopardized until permanent pipe supports are available.

Contrary to the above, as of March 1, 1983, quality requirements for installation of temporary piping supports were not included in Specification 2BVS-920 or Field Construction Procedure 207, the procedure controlling support installation. As a result, the feed-water line 2FWS-016-11-4 was installed in the main steam area without permanent or temporary supports at locations designated on the drawing thereby possibly jeopardizing installation by placing concentrated dead weight loading on the containment penetration.

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RESPONSE

An engineering analysis was completed for piping system 2-CCP-018-031-3 which is presently welded to containment penetration No. X-5 and upheld by support PSR 742 further down the pipe. The point of highest stress and concern is the loading produced on the containment penetration due to the weight of the pipe length attached to it. The analysis of the penetration for the induced dead load shows the resulting penetration stresses to be less than the design allowable stresses. Thus, the absence of a temporary support in this span of piping does not produce stresses that violate the piping design bases. A similar engineering analysis is currently being conducted to determine the extent of stresses produced at containment penetration No. X-76 due to feedwater line 2FWS-016-11-4. Beaver Valley Power Station Unit 2 (BVPS-2) will report the results of this analysis and any corrective action (if required) by June 20, 1983.

To prevent future concerns about induced stresses before permanent supports can be installed, BVPS-2 has issued requirements and procedures addressing the use of temporary pipe supports. 2BVS-920 Revision 7 was issued on March 29, 1983, and FCP-207 Change 8 was subsequently issued on April 28, 1983. These changes provide clear instructions for providing temporary piping supports during construction. The mechanical contractor will have all related training completed and the procedure fully implemented by May 27, 1983.

DUQUESNE LIGHT COMPANY

By E. J. Woolever  
E. J. Woolever  
Vice President

RWF/wjs

cc: NRC Document Control Desk  
Mr. G. Walton, NRC Resident Inspector  
Ms. L. Lazo, Project Manager

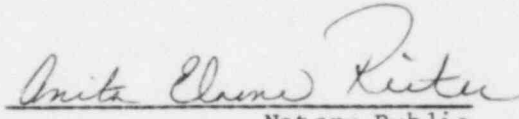
SUBSCRIBED AND SWORN TO BEFORE ME THIS  
20th DAY OF May, 1983.

Anita Elaine Reiter  
Notary Public

ANITA ELAINE REITER, NOTARY PUBLIC  
ROBINSON TOWNSHIP, ALLEGHENY COUNTY  
MY COMMISSION EXPIRES OCTOBER 20, 1986

COMMONWEALTH OF PENNSYLVANIA )  
 ) SS:  
COUNTY OF ALLEGHENY )

On this 20th day of May, 1983, before me,  
a Notary Public in and for said Commonwealth and County, personally  
appeared E. J. Woolever, who being duly sworn, deposed and said that (1)  
he is Vice President of Duquesne Light, (2) he is duly authorized to exe-  
cute and file the foregoing Submittal on behalf of said Company, and (3)  
the statements set forth in the Submittal are true and correct to the best  
of his knowledge.

  
Notary Public  
ANITA ELAINE REITER, NOTARY PUBLIC  
ROBINSON TOWNSHIP, ALLEGHENY COUNTY  
MY COMMISSION EXPIRES OCTOBER 20, 1986