



Duquesne Light

Nuclear Division
P.O. Box 4
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April 19, 1982

• U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Attn: Thomas T. Martin, Director
Division of Engineering and Technical Programs
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
IE Inspection Report No. 82-05

Gentlemen:

In response to your letter of March 23, 1982, and in accordance with 10 CFR 2.201, the attached reply addresses the Notice of Violation which was included as Appendix A with the referenced Inspection Report.

If you have any questions concerning this response, please contact my office.

Very truly yours,

J. J. Carey
Vice President, Nuclear

Attachment: Reply to Notice of Violation

cc: Mr. D. A. Beckman, Resident Inspector
U. S. Nuclear Regulatory Commission
Beaver Valley Power Station
Shippingport, PA 15077

U. S. Nuclear Regulatory Commission
c/o Document Management Branch
Washington, DC 20555

COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF BEAVER) SS:

On this 19 day of April, 1982, before me, Heidi Martin, a Notary Public in and for said Commonwealth and County, personally appeared J. J. Carey, who being duly sworn, deposed, and said that (1) he is Vice President of Duquesne Light, (2) he is duly authorized to execute 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, information and belief.

Heidi Martin
HEIDI MARTIN, NOTARY PUBLIC
CHIPPEWA TOWNSHIP, BEAVER COUNTY
MY COMMISSION EXPIRES JUNE 10, 1985
Member, Pennsylvania Association of Notaries

DUQUESNE LIGHT COMPANY
Beaver Valley Power Station
Unit No. 1

Reply to Notice of Violation
Inspection No. 82-05
Letter dated March 23, 1982

VIOLATION (Severity Level IV; Supplement I)

Description of Violation (82-05-01)

Criterion III, Appendix B, 10CFR 50, in part, states:

"Measures shall be established to assure that applicable regulatory requirements and the design basis are correctly translated into specifications, drawings, procedures and instructions."

"Measures shall be established for the identification and control of design interfaces and for coordination among participating design organizations."

"The design control measures shall provide for verifying the adequacy of design".

Contrary to the above:

- (a) Two design change packages (DCP's), DCP-298 and DCP-299 (a sample) neither identified the applicable regulatory requirements nor contained information to demonstrate how the design requirements were correctly translated into specifications, drawings, procedures, and instructions.
- (b) A review of three design changes, namely, DCP-298, DCP-333, and DCP-303 (a sample), identified inadequate control of design interfaces and coordination among participating design organizations in that the engineering organizations did not inform the licensing organization about the differences between NUREG-0737 requirements and the actual design in a timely and controlled manner. Additionally, the licensing organization did not appraise the engineering organizations of NUREG 0737 commitments made by a corporate officer in a timely and controlled manner.
- (c) The design verification letters for DCP-293 and DCP-299 (a sample) lacked the necessary information for verifying the adequacy of the respective designs.

Corrective Action Taken

A detailed review of all NUREG-0737 related modifications was started and is currently in progress. The objectives of this review are as follows:

- (a) Examine the applicable regulatory requirements for each DCP and ensure that:
 - (1) requirements are included as inputs to the design process
 - (2) compliance to requirements is addressed in design output documents.
- (b) Identify the status and projected schedule of completion as well as any instances where the proposed design deviates from NUREG-0737 requirements. Identified deviations and their proposed corrections or justifications will then be submitted to the NRC for review.

Action Taken to Prevent Recurrence

Procedures will be revised to assure proper identification of regulatory requirements and their translation to design outputs.

Procedures will be developed to control interfaces for correspondence within the Nuclear Division.

A procedure will be developed to control interfaces between all divisions and outside organizations to assure that the regulatory requirements are transmitted to the design engineer and that deviations from regulatory requirements are transmitted to the Licensing Section for records updating and notification of the NRC, as required.

Date On Which Full Compliance Will Be Achieved

The actions listed under "Corrective Action Taken" will be completed prior to Cycle 3 startup.

The actions to prevent recurrence will be completed on or before September 30, 1982.