



Duquesne Light

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February 3, 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. 50-412/82-14

Gentlemen:

This is in response to the Item of Violation cited in Inspection Report No. 50-412/82-14 and listed in Appendix A (Notice of Violation) attached to your letter to Mr. E. J. Woolever, dated January 3, 1983.

NRC VIOLATION (82-14-02)

10CFR50, Appendix B, Criterion IX, states that measures shall be established to assure that special processes such as welding and nondestructive testing are accomplished in accordance with applicable codes, standards, and criteria.

In PSAR Amendment 9, Duquesne Light Company committed to nondestructive testing and examination of the containment lines in accordance with Regulatory Guide 1.19 which indicates that containment penetrations not backed by concrete are to be examined in accordance with the methods of NE 5120 of Section III of the ASME Boiler and Pressure Vessel Code.

For containment pressure boundary closure butt welds of electrical penetration assemblies, NE 5120 or NE 5220 in ASME Code Editions after the Winter 1971 Addenda, requires either radiographic or, as a substitute, ultrasonic plus liquid penetrant or magnetic particle examination of such joints.

Contrary to the above, as of December 10, 1982, Specification 2BVS-931, Appendix J, applicable to containment pressure boundary closure butt welds for electrical penetrations not backed by concrete at elevation 740 of the cable vault area, did not assure that nondestructive testing of such welds was accomplished in


accordance with applicable ASME Code requirements. Although this specification stated that such welding would be in accordance with the requirements of ASME Section III, 1971 Winter 1972 Addenda, it neither required radiographic nor ultrasonic examination of these welds.

Response

Specification 2BVPS-931 has been revised to require ultrasonic plus magnetic particle (root and final passes) examination of closure butt welds of the electrical penetration assemblies. The procedure requires that the examinations be performed in accordance with the techniques and acceptance standard specified in Subsection NE, Class MC Components 5200, 1971-Winter 1972 Addenda of ASME III, utilizing as required Appendix X as quoted by NE 5100.

Duquesne Light Company believes that the above changes fulfill the criteria of Regulatory Guide 1.19 and assures compliance with applicable ASME Code Requirements for volumetric examination of containment pressure boundary closure butt welds for electrical penetrations.

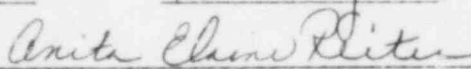
DUQUESNE LIGHT COMPANY

By 
E. J. Woolever
Vice President

SDH/wjs

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

SUBSCRIBED AND SWORN TO BEFORE ME THIS
3rd DAY OF February, 1983.



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 3rd day of February, 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.

Anita Elaine Reiter
Notary Public

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