



Duquesne Light

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May 4, 1983

United States Nuclear Regulatory Commission
Region 1
631 Park Avenue
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ATTENTION: Mr. James Allen^a
Acting Administrator

SUBJECT: Beaver Valley Power Station - Unit No. 2
Docket No. 50-412
Significant Deficiency Reporting

Gentlemen:

Duquesne Light Company (DLC) and Westinghouse (W) have recently entered into discussions regarding the role and responsibility of 10CFR50.55(e) reporting. DLC is hereby reiterating its conclusion to the Nuclear Regulatory Commission (NRC) Inspection and Enforcement (I&E) Regional Office.

It is the DLC position to follow 10CFR, which under 10CFR50.55(e) states that the holder of a construction permit shall notify the NRC I&E Office of each reportable deficiency. As the holder of the Beaver Valley Power Station Unit No. 2 (BVPS-2) construction permit, DLC is directly bound by 10CFR, and, as such, recognizes no one other than itself as the agent to execute the function of reporting 10CFR50.55(e) findings for BVPS-2.

The Nuclear Construction Division (NCD) of DLC has implemented formal procedures which establish the methods for evaluating and reporting significant deficiencies. The procedure requires that every item that is identified as a potential significant deficiency, either by DLC personnel, the NSSS vendor, the Architect Engineer, or any other organization outside of DLC, shall be processed and reported to the NRC as prescribed in the NCD procedure. Therefore, W has been instructed to report all future potential 10CFR50.55(e) items for BVPS-2 only to DLC along with sufficient information for DLC to permit analysis and evaluation of the deficiency and of the suggested corrective action.

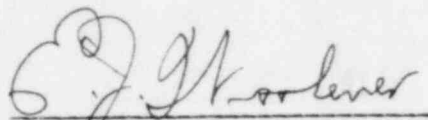
W and DLC both recognize that, since its inception, 10CFR21 provides the principle medium for an NSSS vendor to report substantial safety hazards to the NRC. In fact, 10CFR21 requires that an NSSS vendor report to the NRC any item determined by its own independent evaluation to meet the criteria defined in 10CFR21 for a broad scope of items and activities, including construction-related findings. DLC does not, in any manner, intend or infer to reduce W's responsibility to carry out their required functions as defined by 10CFR21.

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However, to remove uncertainties and redundancies that have occurred with the reporting of recent significant deficiencies, DLC has directed W to report all future potential significant deficiency findings for BVPS-2 only to DLC. DLC will, as a construction permit holder, comply with 10CFR50.55(e) and report to the NRC each deficiency found in the BVPS-2 design and construction which meets the criteria defined in 10CFR50.55(e)(1).

Should you have any questions concerning this issue, please contact Mr. E. F. Kurtz, Jr., Manager of Regulatory Affairs, at (412) 787-5141.

DUQUESNE LIGHT COMPANY

By 
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Vice President

RWF/wjs

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