



Duquesne Light

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April 12, 1984

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Attn: Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
Region 1
631 Park Avenue
King of Prussia, PA 19406

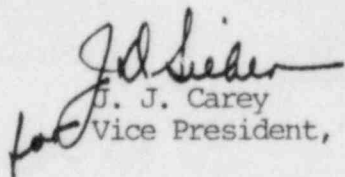
Reference: Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66
Inspection Report 84-02

Gentlemen:

In response to your letter of March 13, 1984, and in accordance with 10 CFR 2.201, the attached reply addresses the Notice of Violation which was included with the referenced report.

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

Very truly yours,


J. J. Carey
Vice President, Nuclear

Attachment

cc: Mr. W. M. Troskoski, Resident Inspector
U. S. Nuclear Regulatory Commission
Beaver Valley Power Station
Shippingport, PA 15077

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DUQUESNE LIGHT COMPANY
Beaver Valley Power Station
Unit No. 1

Reply to Notice of Violation
Inspection 84-02
Letter dated March 13, 1984

VIOLATION (Severity Level IV; Supplement 1)

Description of Violation (84-02-01)

Technical Specification 6.8.1 requires that written procedures shall be established, implemented and maintained covering surveillance and test activities of safety-related equipment.

Quality Assurance Procedure OP-8, Revision 2, requires that measures shall be established to control the issuance, review, approval, distribution and use of documents which prescribe activities affecting quality.

Site Administration Procedure, Chapter 7, Revision 4, requires that documents shall be distributed in a controlled manner to assure recipients are provided with the latest revisions in a timely manner.

Contrary to the above, on January 17, 1984, the Operations Quality Control Group copy of the Ten Year Inspection Plan of the Beaver Valley Power Station Nuclear Generating Plant, Unit 1, was not distributed in a controlled manner in that, date of issue and revision number were not identified, nor was the document reviewed or approved by authorized personnel.

Immediate Corrective Action and Results Achieved

On February 14, 1984, via letter ND1MSL:3065, the Duquesne Light Company (DLCo), Manager of Nuclear Safety and Licensing, requested that the DLCo. Inservice Inspection (ISI) vendor provide the following information to DLCo. for the utility's review and henceforth establishment of administrative controls.

1. A copy of the ISI vendor's updated and revised Ten-Year ISI Plan reflective of all plant modification information as supplied by DLCo. and all examinations performed to date inclusive of the Third Refueling Outage. The updated Ten-Year ISI Plan was requested to be delivered to DLCo. no later than March 31, 1984.
2. All the original documentation paperwork for the Preservice Inspection, Refueling Outage Inspections and the Ten-Year ISI Plan, which has been retained by the vendor was requested to be delivered to DLCo. on or before March 31, 1984.

Immediate Corrective Action and Results Achieved, (Continued)

As a result of a meeting held on April 5, 1984 at Beaver Valley Power Station between the management of DLCo. and its ISI vendor, it was resolved that the vendor would complete Item 1 above, by August 1, 1984. It was also determined, that it was not practical for the vendor to comply with Item 2, above; therefore, the vendor will retain this information on behalf of DLCo.

Action Taken to Prevent Recurrence

As a result of our internal review of the circumstances associated with this violation, we have determined that extensive revisions to the methods used to control the ISI Program are required, as follows:

- A. A draft Nuclear Group Directive (NGD) delineating the guidelines for the administration of the Beaver Valley Power Station, Unit #1, ISI Program (excluding Pump and Valve Program) has been written and was distributed for comment to management.
- B. To assure that future violations of the aforementioned type do not recur on a Company-wide basis, we have developed a comprehensive Plan of Action. This Plan of Action will establish the guidelines from which implementing procedures will be drafted for the administrative control of the Ten-Year ISI Plan, and for the approval of this plan by the designated and authorized personnel from management. The fulfillment of all the work items set forth in this Plan of Action will demonstrate the total commitment of DLCo.'s management to the maintenance of a complete and comprehensive ISI Program.

We have attached an overall projected schedule of the salient action items being taken in response to this violation. We will notify you of any unanticipated delays which could impact the September 15, 1984 submittal of the approved Ten-Year ISI plan.

Date Upon Which Full Compliance Will Be Achieved

Full compliance will be achieved when the Plan of Action is completed on September 15, 1984, with the transmittal of a controlled, reviewed, verified and approved edition of the Beaver Valley Power Station, Unit #1, Ten-Year ISI Plan to the NRC.

Plan of Action for Ten-Year ISI Plan

NOTE: The Ten-Year ISI Plan does not include any requirements related to the IWV and IWP portion of ASME Section XI Code. These Code requirements are addressed in a number of approved test and operating procedures.

A. Existing Ten-Year ISI Plan

1. August 2, 1984 - Obtain the vendor's revised and updated Ten-Year ISI Plan.

B. DLCo. Management

1. May 30, 1984 - Define administrative scope of the ISI Program via a new Nuclear Group Directive.
2. June 30, 1984 - Review and revise existing Nuclear Group Directives (NGD[s] 10 & 2) to reflect the requirements of the ISI Program.
3. July 15, 1984 - Draft a revision to the QA Manual to reflect Items B.1 and B.2.
4. September 15, 1984 - Approve the DLCo. - controlled Ten-Year ISI Plan and transmit to the NRC.

C. DLCo. Controlled Ten-Year ISI Plan

1. July 1, 1984 - Create a unique controlled set of updated isometric drawings which reflect all plant modifications to date.
2. July 1, 1984 - Review all plant modifications relevant to Class I, II and III piping to ensure their inclusion into the Ten-Year ISI Plan.
3. August 1, 1984 - Write and implement the ISI Administrative Procedures which will explicitly delineate the approval, control, review, revision, distribution and administration of the DLCo. ISI Program and the Ten-Year ISI Plan.
4. August 25, 1984 - Create the DLCo. controlled Ten-Year ISI Plan. This plan is to be reflective of items C1, C2, C3 and above.
5. September 4, 1984 - Review and approval of the DLCo. Ten-Year ISI Plan.