



Duquesne Light

Nuclear Construction Division
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October 1, 1984

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

ATTENTION: Dr. Thomas E. Murley
Administrator

SUBJECT: Beaver Valley Power Station - Unit No. 2
Docket No. 50-412
Removed, Dismantled, or Partially Dismantled Pipe Supports
Significant Deficiency Report 84-06, Interim Report

Gentlemen:

This interim report is in reference to the reportable significant deficiency relating to the removed, dismantled, or partially dismantled pipe supports. Pursuant to the requirements of 10CFR50.55(e), it is anticipated that a subsequent report will be submitted to Region I by December 1, 1984.

DUQUESNE LIGHT COMPANY

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

SDH/wjs
Attachment

cc: Mr. R. DeYoung, Director (3) (w/a)
Ms. M. Ley, Project Manager (w/a)
Mr. E. A. Licitra, Project Manager (w/a)
Mr. G. Walton, NRC Resident Inspector (w/a)
INPO Records Center (w/a)
NRC Document Control Desk (w/a)

SUBSCRIBED AND SWORN TO BEFORE ME THIS
1st DAY OF Dec, 1984.

Anita Elaine
Notary Public

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

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COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF ALLEGHENY)

On this 1st day of October, 1984, 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 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.

Anita Elaine Reiter
Notary Public

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

BEAVER VALLEY POWER STATION - UNIT NO. 2
DUQUESNE LIGHT COMPANY

Report on Significant Deficiency No. 84-06
Removed, Dismantled, or Partially Dismantled Pipe Supports

1. Summary

Thirty-four (34) pipe supports, which were originally installed and inspected, were discovered to be removed, dismantled, or partially dismantled during an inspection by Site Quality Control (SQC). A subsequent investigation has identified ten (10) additional pipe supports with similar problems for a total, to date, of forty-four (44) pipe supports. An analysis of the identified pipe supports is addressed in paragraph 4.

2. Immediate Action Taken

On June 11, 1984, Mr. J. Stabb, Compliance Engineering in Duquesne Light Company's (DLC) Regulatory Affairs Department, notified Mr. G. Myer of the NRC Region I Office of this reportable deficiency. DLC submitted additional information in letters 2NRC-4-101, dated July 12, 1984, and 2NRC-4-137, dated August 31, 1984.

3. Description of the Deficiency

The subject deficiency is due to a lack of adequate control over the rework or removal of various pipe supports.

4. Analysis of Safety Implications

Of the forty-four (44) identified pipe supports, forty-three (43) have been evaluated with the following results: 1) documentation has been identified which would have ensured reinspection of thirty-nine (39) of these supports; 2) a detailed investigation of four (4) non-safety-related Seismic Category II supports, which did not have adequate documentation to ensure reinspection, has revealed that absence of or failure of these supports would not have resulted in any adverse impacts on safety-related components, systems, or functions.

The remaining support has been partially evaluated. This support, 2CHS-PSR-278Y, is safety-related, Seismic Category I. Evaluations to establish the safety significance of the absence of this support are ongoing as are the investigations to determine if adequate documentation existed for this support to ensure its reinstallation and reinspection.

To date, no individual support with identified rework control problems has been determined to be safety significant. However, DLC considers the lack of adequate control of rework to be a deficiency with the potential to impact the safe operation of the plant, and is committed to pursuing the identification and correction of this issue as with other safety significant deficiencies.

5. Corrective Action to Remedy the Deficiency

The BVPS-2 project has issued FCP-41, "Rework Control Program," dated September 7, 1984, governing the removal of previously accepted work to allow other work to proceed. Construction is now identifying all additional pipe supports which have been dismantled or partially dismantled. These supports are being entered into the Rework Control Program for tracking. Any subsequent supports requiring dismantling will also be entered and tracked in this program. The results of this effort will be provided in the final report.

6. Additional Reports

It is anticipated that a subsequent report will be issued by December 1, 1984.