



Duquesne Light

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November 5, 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
Potential Significant Deficiency Report No. 84-11, Interim Report
"QC Acceptance of Undersized/Incomplete Welds on HVAC/Pipe
Supports"

Gentlemen:

This is the initial written report concerning a Potential Significant Deficiency 84-11, "QC Acceptance of Undersized/Incomplete Welds on HVAC/Pipe Supports." The final determination of reportability with respect to 10CFR 50.55(e) has not been completed. An additional report will be submitted after this evaluation has been completed. DLC expects to submit this report by December 3, 1984.

DUQUESNE LIGHT COMPANY

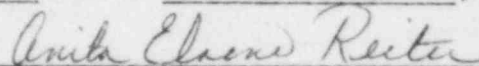
By 
E. J. Woolever
Vice President

RW/wjs
Attachment

cc: Mr. R. DeYoung, Director (3) (w/a)
Mr. B. K. Singh, Project Manager (w/a)
Mr. G. Walton, NRC Resident Inspector (w/a)
NRC Document Control Desk (w/a)

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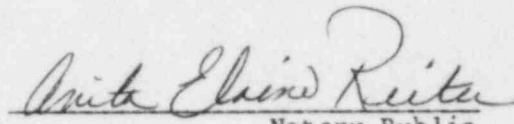
SUBSCRIBED AND SWORN TO BEFORE ME THIS
5th DAY OF November, 1984.


Anita Elaine Reiter
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 5th day of November, 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.


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

Potential Significant Deficiency Report 84-11
QC Acceptance of Undersized/Incomplete Welds on HVAC/Pipe Supports

1. SUMMARY

Welding audits at BVPS-2 identified inspection errors with reference to welding on HVAC/Pipe supports. Subsequent investigation indicated that the problems involved three inspectors. One inspector had been assigned to the inspection of pipe supports. The other inspector performed inspections of HVAC supports.

One inspector had resigned prior to discovery of these deficiencies. Another inspector has been terminated from the project. The certification on the third inspector was suspended on October 5, 1984. Evaluation of this inspector is still in progress.

2. IMMEDIATE ACTION TAKEN

A program was initiated to have all HVAC supports inspected by the two inspectors involved in the improper acceptance of HVAC supports and all pipe supports accepted by the third inspector subjected to 100% reinspection. This activity is almost completed.

Mr. S. D. Hall, Acting Manager of Duquesne Light Company's (DLC) Regulatory Affairs Department, notified Mr. Lowell Tripp, of the NRC's Region I Office by telephone on October 5, 1984, that DLC considered this matter to be potentially reportable under 10CFR50.55(e).

3. DESCRIPTION OF THE DEFICIENCY

Previously accepted HVAC/Pipe supports have been determined not to have met Engineering criteria with respect to welding.

4. ANALYSIS OF SAFETY IMPLICATION

DLC management determined that this problem should be identified as potentially reportable as it concerned a programmatic weakness in the BVPS-2 Quality Assurance Program.

Evaluation of the welds improperly accepted by these inspectors has resulted in a preliminary indication that the deficiencies were not safety significant. However, the results of this evaluation have not been available for a sufficient time to allow adequate review by the required DLC departments. Therefore, this item is still considered as potentially reportable until adequate review is completed and a further report submitted.

5. CORRECTIVE ACTION TO REMEDY DEFICIENCY

The corrective action consists of three basic actions:

- a) The improvement and clarification of Engineering instructions issued to the field for Construction and QC Inspectors' use. This action is

already being implemented by the formation of the Constructability Review Team that has been referenced in our response to your Inspection 84-06.

- b) Emphasis being placed on the need to obtain the Engineering requirements by the contractor's forces prior to the work being offered for QC Inspection. This action is supported by the activities of an integrated Site Welding Management Group.
- c) The formation of a group of Inspectors not in any way responsible to the Contractor's Management to verify the condition of previously accepted pipe and HVAC supports on a continual basis.

The provisions to provide this additional assurance of the integrity of the QA program have been implemented and will remain in place, subject to modifications based on feedback from these mechanisms.

6. ADDITIONAL REPORTS

DLC expects to submit an additional report on this matter by December 3, 1984.