



## Duquesne Light

Nuclear Construction Division  
Robinson Plaza, Building 2, Suite 210  
Pittsburgh, PA 15205

2NRC-4-200

(412) 787-5141

(412) 923-1960

Telecopy (412) 787-2629

December 3, 1984

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

ATTENTION: Dr. Thomas E. Murley  
Administrator

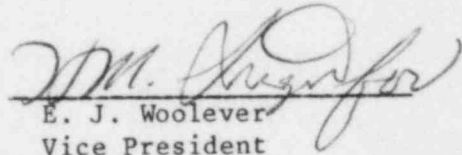
SUBJECT: Beaver Valley Power Station - Unit No. 2  
Docket No. 50-412  
Removed, Dismantled, or Partially Dismantled Pipe Supports  
Significant Deficiency Report 84-06, Final Report

Gentlemen:

This final 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 no additional reports will be submitted to Region I.

DUQUESNE LIGHT COMPANY

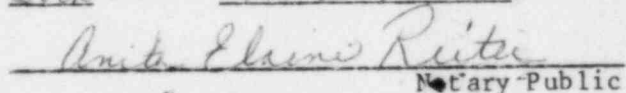
By

  
E. J. Woolever  
Vice President

SDH/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)  
INPO Records Center (w/a)  
NRC Document Control Desk (w/a)

SUBSCRIBED AND SWORN TO BEFORE ME THIS  
30th DAY OF November, 1984.

  
Notary Public

8412200361 841203  
PDR ADOCK 05000412  
S PDR

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


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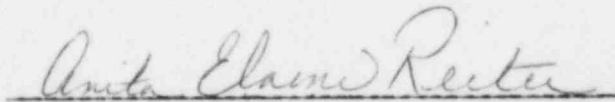
COMMONWEALTH OF PENNSYLVANIA )  
 ) SS:  
COUNTY OF ALLEGHENY )

The Manager, Engineering, H. M. Siegel, being first duly sworn, deposes, and says: that he is Manager, Engineering, Beaver Valley Unit 2 of Duquesne Light Company; with legal authority to sign official correspondence on behalf of the Vice President - Nuclear Construction Division, Earl J. Woolever, in relation to licensing for Beaver Valley Power Station, Unit 2 and therefore authorized to submit the foregoing on behalf of the applicant.

11-30-84  
Date

  
Manager, Engineering

Sworn and subscribed before me,  
this 30th day of November, 1984.

  
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 identified ten (10) additional pipe supports with similar problems for a total 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; 2NRC-4-137, dated August 31, 1984; and 2NRC-4-157, dated October 1, 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 one (1) remaining support, 2CHS-PSR-2784, has been evaluated with the following results. Pipe support 2CHS-PSR-2784 is a safety-related, Seismic Category I large bore pipe support on the charging system. The support was inadvertently removed by construction with no adequate documentation provided to ensure subsequent reinstallation and reinspection of the support. However, calculations indicate that the absence of this pipe support would not have adversely impacted the capabilities or operation of the charging system, nor the capabilities or operation of any other system in the plant.

5. Corrective Action to Remedy the Deficiency

The BVPS-2 Project has issued FCP-41, "Rework Control Program," dated September 7, 1984, governing the dismantling or partial dismantling of previously accepted pipe supports in order to allow other work to

proceed. Construction has developed a list describing the previously dismantled or partially dismantled pipe supports. These supports have been included in the FCP-41 Program, with the exception of those that had specific Nonconformance and Disposition Reports affecting them. Any subsequent supports that fall into this category will be entered into the FCP-41 Program.

In addition to the above action, a QC Inspector has been assigned to perform surveillance of this activity in order to give assurance that the intent of the program is being fulfilled. The QC surveillance activities are currently in accordance with Memo DLC-SQCL-#1063F. SQC Procedure 3.2, describing QC involvement, has recently been issued, November 29, 1984, and a detailed Inspection Plan will be issued within the next few weeks formalizing the detailed instructions contained in Memo DLC-SQCL-#1063F. Evidence to date indicates that the program is being implemented, with few deviations that have been corrected.

6. Additional Reports

It is anticipated than no additional reports will be issued.