

MAY 14 1985

Docket No. 50-412

Duquesne Light Company  
ATTN: Mr. E. J. Woolever  
Vice President  
Nuclear Construction  
Robinson Plaza Building No. 2  
Suite #210, PA Route 60  
Pittsburgh, Pennsylvania 15205

Gentlemen:

Subject: Inspection Report No. 50-412/85-02

This refers to your letter dated April 22, 1985, in response to our letter dated March 22, 1985.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

*Original Signed By*  
*Clifford J. Anderson*  
for *Stewart D. Ebnetter*, Director  
Division of Reactor Safety

cc w/encl:

E. J. Woolever, Vice President, Nuclear Construction Division  
E. Ewing, Quality Assurance Manager  
R. J. Swiderski, Manager, Startup Group  
R. E. Martin, Manager, Engineering  
E. F. Kurtz, Jr., Manager, Regulatory Affairs  
P. RaySircar, Stone and Webster Engineering Corporation  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
NRC Resident Inspector  
Commonwealth of Pennsylvania

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05/09/85

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bcc w/encl:  
Region I Docket Room (with concurrences)  
Senior Operations Officer (w/o encl)  
DRP Section Chief  
J. Grant, DRP

RI:DRS  
Gray/mmb  
5/13/85  
*AgK*

RI:DRS  
Kortas  
5/13/85  
*AgK*

RI:DRS  
Wiggins  
5/13/85

RI:DRS  
Durr  
5/13/85  
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## Duquesne Light

Nuclear Construction Division  
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April 22, 1985

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

ATTENTION: Mr. Richard W. Starostecki  
Division of Project and Resident Programs

SUBJECT: Beaver Valley Power Station - Unit No. 2  
Docket No. 50-412  
USNRC IE Inspection Report No. 40-412/85-02

REFERENCE: NRC Inspection Report 85-02 to Mr. E. J. Woolever dated March 22, 1985

Gentlemen:

This is in response to the Notice of Violations cited in Inspection No. 50-412/85-02 and listed in Appendix A (Notice of Violation) attached to your letter to Mr. E. J. Woolever, dated March 22, 1985.

### A. Notice of Violation

10CFR50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by procedures or drawings.

The Beaver Valley Power Station Unit 2 (BVPS-2) FSAR, Section 17.1, Quality Assurance during Design and Construction, which refers back to BVPS PSAR Section 17.2.1.5A, Instructions, Procedures and Drawings, requires that activities affecting quality shall be prescribed by documented procedures and drawings. The BVPS-2 Field Construction Procedure No. FCP-302 requires that an Assembly/Disassembly report be issued for authorized valve work.

Contrary to the above, on January 22, 1985, the installed valve VCW-150-X2 (V-115) on line 2-SIS-010-10-2 was found with loose nuts including one missing nut on the shaft seal plates. The documentation for the valve has been signed off by QC inspection as complete. It was determined that no Assembly/Disassembly Report was issued for the installation changes of shaft seal plate covers; thus, indicating unauthorized or incomplete work had been accomplished.

### Corrective Actions

Nonconformance and Disposition (N&D) 7994 has been generated for the subject valve and a replacement nut is now being obtained in accordance

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with ASME XI Code requirements. Upon receipt, the nut will be installed and the tightness of all the shaft seal nuts will be verified. This work is currently scheduled to be complete by July 1985.

In order to prevent any future occurrence of unauthorized rework the following has been done. The mechanical and electrical contractors have been instructed to ensure that their personnel are thoroughly familiar and working in compliance with the requirements of the site rework control program. Failure to comply with the program will lead to disciplinary action. Duquesne Light Company's Architect Engineer, Stone and Webster, will provide management control to ensure adherence to the requirements of the rework control program.

#### B. Notice of Violation

10CFR50, Appendix B, Criterion IX, requires nondestructive testing to be controlled and accomplished in accordance with applicable codes, standards, specifications, criteria, and other special requirements.

The drawing 883D683 for the Reactor Vessel Internals Energy Absorber Assembly requires penetrant inspection of the upper weld to quality level "B" defined in W PS 595139. Quality Level "B" prohibits cracks or other linear indications. This component was fabricated and considered acceptable prior to shipment to the field for installation.

Contrary to the above, on January 24, 1985, the NRC initiated liquid penetrant inspection of this shop weld on component K468A02 disclosed linear indications exceeding the limits of Quality Level "B".

#### Corrective Actions

Upon Notification of the Inspector's concern, a liquid penetrant examination was performed in accordance with DLC's Procedure PT-10, revision date January 17, 1984. The examination conducted according to this procedure was performed without acceptance or rejection criteria being applied since DLC's NDE Inspectors were not qualified for the W procedure quoted in the Inspector's report. The results of this examination are shown on NDE Report #111465. In summary, within the 1-1/4" area of interest selected by the Inspector, four (4) discontinuities were discovered, ranging in size from 1/32" to 3/16"; the 3/16" indication was blotched.

Following this examination, W initiated Field Deficiency Report DMWM-10132 to document the event and to track any subsequent activities.

It was established that the equipment supplier was W Pensacola Division in Florida; and, following instructions, W researched their shop records and retrieved the original LP Inspection Instructions/Recording Form that identified the piece by serial number. The report has evidence of the NDE Inspector's stamp of acceptance, dated August 10, 1976.



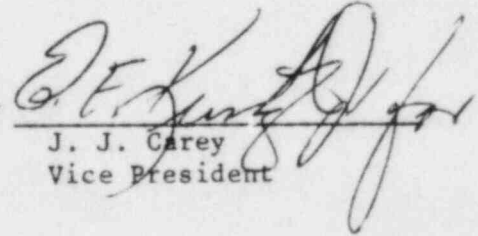
During this investigation, it was further established that the procedure in use at the time was W Quality Inspection Procedure #8100, Revision 1. A level III Examiner from the manufacturer attended the site and repeated the LP examination utilizing the referenced original procedure. The examiner evaluated the results against that procedure and found them acceptable.

Following this examination, a light buffing was applied to the area of interest and the LP examination was repeated, with acceptable results. The details of these inspections are described in W letters QE-85-030 and QE-85-031, respectively. The associated documentation and the dispositioned W Field Deficiency Report are available to the NRC Resident Inspector for review at the site as required.

As noted in the Inspector's report, the original concern was obtained by visual examination; and, in consequence, an informal visual examination of the remaining three similar welds was performed by W personnel with no evidence of surface discontinuities. Based on this action, it is considered that in addition to the LP examinations being evaluated as acceptable, this type of visual discontinuity was an isolated case.

DUQUESNE LIGHT COMPANY

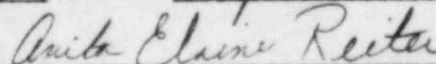
By

  
J. J. Carey  
Vice President

JS/wjs

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

SUBSCRIBED AND SWORN TO BEFORE ME THIS  
32nd DAY OF April, 1985.



Notary Public

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

COMMONWEALTH OF PENNSYLVANIA )  
 ) SS:  
COUNTY OF ALLEGHENY )

The Manager, Regulatory Affairs, E. F. Kurtz, Jr., being first duly sworn, deposes, and says: that he is Manager, Regulatory Affairs, of Duquesne Light Company, with legal authority to sign official correspondence on behalf of the Vice President, Nuclear Division, J. J. Carey, in relation to licensing for Beaver Valley Power Station, Unit 2, and is therefore authorized to submit the foregoing on behalf of the applicant. knowledge.

4-22-85  
Date

E. F. Kurtz, Jr.  
Manager, Regulatory Affairs

Sworn and subscribed before me this  
22nd day of April, 1985.

Anita Elaine Reiter  
Notary Public

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