

JUL 30 1985

Docket No. 50-412

License No. CPPR-105

Duquesne Light Company
ATTN: Mr. J. J. Carey
Vice President
Nuclear Group
Post Office Box 4
Shippingport, Pennsylvania 15077

Gentlemen:

Subject: Inspection Report No. 50-412/85-07

This refers to your letter dated July 9, 1985, in response to our letter dated June 7, 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:~~

Stewart D. Ebnetter
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

OFFICIAL RECORD COPY

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07/17/85

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PDR ADOCK 05000412
G PDR

IE01 11

bcc w/encl:

Region I Docket Room (with concurrences)


Senior Operations Officer (w/o encl)

DRP Section Chief


T. Rebelowski, SRI, Millstone 3

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Anderson

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cfa


RI:DRS
Durr

7/8/85
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RI:DRS
Ebnetter

7/11/85

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07/17/85



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

2NRC-5-099

(412) 787-5141

(412) 923-1960

Telecopy (412) 787-2629

July 9, 1985

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

ATTENTION: Mr. Stewart D. Ebnetter, Director
Division of Reactor Safety

SUBJECT: Beaver Valley Power Station - Unit No. 2
Docket No. 50-412
Inspection Report 50-412/85-07

REFERENCE: Letter dated June 7, 1985 (S. D. Ebnetter to J. J. Carey)

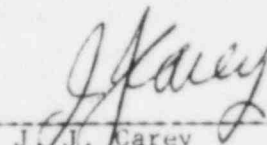
Gentlemen:

The above-referenced letter transmitted a Notice of Violation as Appendix A. Attachments A through C of this letter provide Duquesne Light Company's (DLC) response pursuant to the requirements of 10CFR2.201 and the NRC's Notice of Violation.

The subject inspection report requested that DLC also inform the NRC of the actions taken or planned to address the two programmatic weaknesses identified during inspection 85-07. DLC is evaluating these concerns in conjunction with related concerns identified in the BVPS-2 SALP. DLC will respond to these concerns by July 26, 1985.

DUQUESNE LIGHT COMPANY


By


J. J. Carey
Vice President

RW/wjs
Attachment

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

SUBSCRIBED AND SWORN TO BEFORE ME THIS
14 DAY OF July, 1985.


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 24 day of July, 1985, before me, a
Notary Public in and for said Commonwealth and County, personally appeared
J. J. Carey, 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

ATTACHMENT A

NOTICE OF VIOLATION 85-07-05, -06, and -11

10CFR50, Appendix B, Criterion V states in part that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings..."

(1) 85-07-05

Duquesne Light Company (DLC) Site Quality Control (SQC) Manual Procedure No. 4.4, titled "Nonconformance and Disposition Reports," paragraph 5.3.3 states, "Work on a particular activity shall be discontinued upon the issuance of an N&D if continued work could cause damage, prevent further inspections, or prevent remedial action."

Contrary to the above, the inspector witnessed the continuation of a bulk cable pull consisting of 23 cables (2HCSAOC606, 2QSSAOC003, 2RSSAOC011, ...). This pull included seven cables that were kinked and one which had three longitudinal cuts in the jacket. These eight cables were identified as nonconforming by SQC on March 22, 1985, and later pulled on March 25, 1985. This continued work could have caused damage to or prevented remedial action for these cables.

(2) 85-07-06

The Electrical Installation Specification, 2BVS-931, Section 3.2.1.14 states, "The minimum bending radii shall not be less than the bending radius given in cable specifications for each table."

Contrary to the above, two instances of minimum bending radius violations were identified by the inspectors as follows:

- (a) Cables 2FPWAOK600 and 2FPWAOK601 located in junction box 2JB*5012 were in violation of their minimum bend radius criteria of less than 2.1 inches. The measured value was approximately 1.0 inch.
- (b) Cable 2S1SBPH301, which powers safety injection pump 2S1S*P21B was coiled and hanging overhead by a rope, creating a minimum bend radius violation of less than the specified 11 inches. The measured value was approximately ten inches.

(3) 85-07-11

The Electrical Installation Specification, 2BVS-931, page 3-35, lines 8 and 9, states in part, "all cables installed in trays shall be protected against mechanical damage."

Contrary to the above, cables were damaged in cable raceway No. 2TC138P. These cables were not protected from mechanical damage as evidenced by cables exiting the raceway at support No. QC93 were in contact with the sharp edge of the raceway siderail causing an indentation in the cable cover to 50% of its thickness.

The above are collectively a severity IV violation (Supplement 11).

RESPONSES

(1) 85-07-05

This violation relates to the failure of site personnel to follow project procedures with respect to work affected by N&D's when the work involved is of a dynamic nature and in-process. As a result of a review of the events leading to this violation, the following actions were taken:

- (a) The Director of DLC SQC issued a clarifying memorandum, DLC-SQCL-#1183 dated 3/27/85, re-emphasizing to QC staff and Inspectors the need for the immediate tagging of an unsatisfactory condition during such a dynamic process as cable pulling. This instruction was distributed to all Lead, Senior, and QC Inspectors certified for the verification of cable pull activities. The immediate tagging of such a condition is, in effect, a "Stop Work" on that activity until the N&D is formally issued, processed, and dispositioned.
- (b) The electrical contractor has reinstructed his supervisors regarding in-process inspection during cable pulling and has implemented management measures for identification and control of any conditions in violation of requirements which result in stopping cable pulling activities.
- (c) The Superintendent of the Site Engineering Group re-emphasized the procedures for N&D processing for cable pulling activities to the electrical personnel assigned to the Integrated Construction Support Group (ICSG).

For the specific cables cited, two N&D's were initiated: N&D 15993A for the seven cables that were kinked and N&D 16057 for the cable that was cut. N&D 15993A has been dispositioned to accept the cables involved and N&D 16057 has been dispositioned to scrap the cable that was cut.

(2) 85-07-06

Item "(a)":

This condition is believed to have occurred following the installation of additional cables in the enclosure, violating previously accepted cable training radii. SQC performed a random re-inspection of 30 previously accepted installations within enclosures and found no other similar violations. To preclude possible recurrence the Electrical Contractor has reiterated to its personnel the need to ensure that all cables, including previously installed cables, comply with the minimum cable bend radius criteria. SQC has revised its Inspection Plan IP-8.4.1 to verify that the above requirements are fulfilled.

As stated in the Inspector's report, SQC initiated N&D 15969 for the specific cable cited. The disposition required the cable to be re-trained; this has been accomplished and the N&D has been closed.

Item "(b)":

The project has initiated a program to improve the temporary storage of cable to prevent the violation of the cable minimum bend radius and the potential for storage induced cable jacket damage. These measures have included the instruction of contractor personnel concerning precautions required for the temporary storage of cable and the requirement relating to the installation of temporary cable support racks. FCP-431 was revised on 6/28/85 to define typical acceptable methods for temporary coiled cable storage. The appropriate training of Electrical Contractor personnel will be completed by 7/15/85. The responsibility for the proper storage of temporary coiled cable has been formally assigned to the appropriate Cable Pulling Foreman. To ensure temporary coiled cable is stored in accordance with the requirements of FCP-431, the Electrical Contractor and SQC are performing an examination of safety related cable in temporary coiled storage condition. Any deficient conditions found will be corrected by 7/26/85. For future installations, SQC has initiated a formal surveillance inspection program for an in-process review of temporary coiled cable storage as defined in IP-8.4.2.

For the specific cable cited, N&D 16014 has been dispositioned as acceptable and the N&D has been closed.

(3) 85-07-11

At the time of the subject inspection, SQC was performing a backfit inspection of cable installations, in accordance with IP-10.2.3. This Inspection Plan included an inspection for cable jacket damage. To date, in excess of 1,400 transition point installations have been inspected and two cables exhibiting cable jacket damage have been identified; one requiring a repair and the other found acceptable. The results of this inspection, so far, indicate that installation damage of the type described can be considered isolated instances. However, FCP-431 was revised on 6/28/85 to describe protective measures to be taken to prevent similar instances of cable damage. The appropriate training of Electrical Contractor personnel will be completed by 7/15/85. IP-8.4.1 will be revised and the appropriate training given to QC personnel by 7/15/85.

For the specific condition cited, N&D 16013 identified three cables with jacket indentation. Engineering has evaluated the indentations on two cables (Mark Nos. NKA-02 and 2/C-12AWG) as acceptable and one cable (Mark No. NKA-06) as unacceptable. N&D 16013 has been dispositioned accordingly.

ATTACHMENT B

NOTICE OF VIOLATION 85-07-09

10CFR50, Appendix B, Criterion XVII states in part, "... sufficient records shall be maintained to furnish evidence of activities affecting quality ... Records shall be identifiable and retrievable."

The DLC Quality Assurance Manual Section 17.3 states in part, "... records are required to be maintained ... for the life of a particular item ...". Section 17.4.2 states in part, "... the Architect Engineer/Construction shall develop and maintain a Records Management System which will ... store records in a readily identifiable and easily retrievable manner ...".

Contrary to the above, records were not maintained or retrievable to furnish evidence that calculations to support pulling of electrical cable, an activity affecting quality, properly considered sidewall pressure.

This is a severity IV violation (Supplement II).

RESPONSE

SWEC has evaluated the circumstances surrounding the missing site-generated electrical calculation. Interviews with SWEC SEG personnel have indicated that the subject calculation was the only generic electrical calculation prepared in the field. Other specific electrical calculations have been performed in the body of engineering documents or under E&DCRs, and are retrievable as part of those documents. To further ensure the adequacy of any supporting calculations used in the development of electrical criteria or engineering requirements, SWEC is conducting a comprehensive review of 2BVS-931 to verify that calculations, codes or standards utilized as bases for the specification are accurate, applicable, retrievable, and properly documented. To date, no additional cases of missing documentation have been identified. This review and any necessary corrective actions will be completed by 9/30/85.

To prevent recurrence, measures have been implemented within the SEG to ensure that the record keeping requirements of SWEC Engineering Assurance Procedure EAP 5.3 are followed for all calculations prepared by the site.

ATTACHMENT C

NOTICE OF VIOLATION 85-07-04

10CFR50, Appendix B, Criterion V states in part, "Activities affecting quality shall be prescribed by documented ... procedures ... and shall be accomplished in accordance with these ... procedures ...".

- (1) Procedure 2BVSM-83 Section 4, requires that corrections/errors, changes/additions be crossed with a line, initialed and dated by the person making notation.

Contrary to the above, engineering documents in the document review group were found with corrections and deletions that were not properly initialed and dated. In addition, corrections and deletions were made by QC personnel on vendor documentation without the date or initials of the person making the notation.

- (2) Procurement specification 2BVS-636, page 2-6, lines 38-43, requires that "seller submit a certificate of compliance which will be stamped and signed by a Registered Professional Engineer with the statement that he has seen and reviewed the adequacy of the method for establishing that the seismic design requirements have been met.

Contrary to the above, a vendor test report was accepted based on the vendor Professional Engineer statement that the test results "... appear to conform to seismic requirements."

- (3) Procedure TP-2 Section 4.3 for Qualification and Certification states "the Director or Assistant Director/QC shall certify inspection/testing personnel by his signature."

Contrary to the above, two QC inspectors were certified by an individual other than the Director or Assistant Director/QC.

- (4) Procedure 2BVSM-202, Section 5.26.6 requires the Responsible Engineer using an approval stamp to initial and date use of the stamp on engineering documents.

Contrary to the above, the Responsible Engineer used an approval stamp on SDDF documents without the date and initials of the person authorized to use the stamp.

The above are collectively a Severity Level V Violation (Supplement II).

RESPONSE

- (1) Items "(1)" and "(4)":

As stated in the subject report, Site Project Management issued a memorandum on 3/26/85 to reiterate to personnel the requirements for document corrections and deletions. In addition, QC Management issued

a similar memorandum dated 3/22/85 on the same subject to QC personnel. Project Procedure 2BVM-202 was revised to correct SDDF annotation discrepancies. In addition, the Superintendent of the SEG reiterated to his supervisory personnel and the Supervisor of the Document Review Group their responsibility for ensuring that documents are administratively correct. To measure the effectiveness of the corrective action, a formal review of 500 of the approximately 1,200 documents (N&Ds, E&DCRs, and SDDFs with associated Material Receiving Reports [MRR] and Receipt Inspection Reports [RIR]) processed through the SEG between April 1, 1985, and June 15, 1985, was conducted by the Engineering Assurance Engineer assigned to the SEG. This review identified 30 documents with minor administrative discrepancies and indicates the project action has reduced the number of administrative discrepancies. Site project management will continue to monitor performance in this area and take action as necessary to improve performance of personnel in following administrative procedures.

(2) Item "(2)":

One discrepancy cited by the NRC involved the seismic certificate of compliance statement, "appear to conform to seismic requirements" that was identified as not being in compliance with procurement Specification 2BVS-636 page 2-6, lines 38-43. A review of 30 additional seismic certificates of compliance indicated specification prescribed wording was correct. The seismic report for the cited certificate of compliance has been reviewed by engineering and found to be technically correct. Thus, no additional action is required or recommended concerning certificate of compliance documentation.

DLC/QA and SWEC Engineering Assurance will re-examine areas found deficient by the NRC in a regular audit scheduled for August 1985.

(3) Item "(3)":

TP-2 has been revised to permit, when designated, a certified Level III in the appropriate discipline to certify inspection/testing personnel by his signature. Since the individual in question met these requirements, no further action will be taken.