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July 26, 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

REFERENCES: 1) Inspection Report No. 50-412/85-07, dated June 7, 1985 (S. D. Ebnetter, NRC Region I, to J. J. Carey, DLC)
2) 2NRC-5-105, dated July 19, 1985 (J. J. Carey, DLC, to Dr. T. E. Murley, NRC Region I)

Gentlemen:

Reference 1 requested that Duquesne Light Company (DLC) respond to two programmatic weaknesses identified during Inspection 85-07. The following provides DLC response to the identified areas of concern.

Weakness 85-07-01: "Project Management Changes/NCD Procedures Manual (extract from Reference 1)"

Duquesne Light Company (DLC) Project Management and the DLC Nuclear Construction Division have undergone frequent changes during the past year. This is related to changes in the project from a construction-only phase to a construction-startup phase. Evidences of this are:

- * DLC organizational changes in the past year have resulted in three different individuals handling the duties of NCD Project Manager.
- * The DLC Nuclear Construction Division Procedures Manual requires substantial revisions in the areas of Section 1.0, "Management"; Section 5.0, "Construction"; and Section 7.0, "Project Control."

Response 85-07-01:

All significant changes to the administrative procedures have been completed. Additional minor changes which involve corrections to job titles and certain review and approval chains are in progress. We expect to complete this effort over the next several weeks. All necessary revisions will be issued by September 15, 1985.

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The changes to the organization, which were identified in the inspection report, reflect the transition of project leadership from our remote offices at Robinson Plaza location to the site where the major effort is taking place.

The Construction Department has been eliminated as a distinct department with some duties transferring to the Project Controls Department and others to the Startup Group.

It is correct that three distinct individuals have served as the project manager. However, the changes have reflected an upward movement of these responsibilities to the Vice President, Nuclear, who has been responsible for the project since December 1983. This transfer of responsibilities was made subsequent to the delegation of the day-to-day responsibilities for BVPS-1 to the Senior Manager which enabled the Vice President, Nuclear Group, to devote full time to the BVPS-2 Project.

It is considered that the organizational changes will facilitate the transformation from the construction and startup mode to an operating plant at the time of fuel loading.

As described in our July 19, 1985, response to the SALP, we have retained a consultant to review our existing project organization. We shall keep you informed if additional changes are undertaken as a result of this review.

Weakness 85-07-13: "Engineering/Construction Interface in the Electrical Area
(extract from Reference 1)

Significant overall progress has been made in improving the interface between engineering and construction within the last year. However, there is evidence of lingering problems in the engineering construction interface for electrical construction activities. These include:

- * A cable pull violation resulting from interface difficulties between engineering, construction, and quality control.
- * During the inspection, S&W engineering personnel could not demonstrate that cable sidewall pressure was included in cable pull calculations. For a period of 30 days following the inspection, S&W engineering personnel could not demonstrate that cable sidewall pressure was satisfactorily considered for all installed cable.
- * During the inspection S&W engineering personnel could not establish torquing requirements for bolted connections when terminating 4160 volt power cables to the load side of the circuit breaker stabs. Inconsistencies exist between electrical installation specification 2BVS-931, the cable terminating field construction procedure FCP-432, the inspection procedure IP 8.5.2, and the Sargent Electric Company (SECO) drawings concerning the tightening of hardware.

Response 85-07-13:

The NRC's concerns for this area can be divided into two distinct categories, specific concerns and general concerns. The specific concerns have been identified as NRC Unresolved Items or Violations and are being tracked to ensure timely resolution and completions. Certain of the issues have precipitated changes in the procedures or processes governing electrical activities within engineering, SQC, or the electrical contractor. The general concern, while noting that significant overall progress has been made in the engineering/construction interface, indicates that additional attention is required in the specific area of electrical construction/engineering interface.

An integrated and detailed plan, entitled the Electrical Plan Guide (EPG) has been developed and was issued for official project use on June 10, 1985. It describes the plans for resolution of engineering items and completion of construction and inspection activities on tasks important to the electrical effort. The plan will be kept up to date on a quarterly basis.

The Project has recently undertaken an overall review of the BVPS-2 electrical installation specification, the electrical Field Construction Procedures, and the SQC electrical Inspection Procedures. The objective of this review is to ensure consistency among these documents and to ensure each document is complete regarding its purpose. The review of the electrical installation specification will identify the bases used to develop the various numerical limits and requirements specified and will provide assurance that calculations, codes, or standards used as bases for the specification are properly documented. These reviews and any necessary corrective actions are scheduled to be completed by September 30, 1985.

Finally, the staffs of both the Site Engineering Group and the Integrated Construction Support Group have been strengthened through the addition of senior experienced electrical engineers. The introduction of these individuals has improved the interface among engineering, construction, and quality control.

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

Sheila M. Fattore
Notary Public

SHEILA M. FATTORE, NOTARY PUBLIC
SHIPPINGPORT BORO. BEAVER COUNTY
MY COMMISSION EXPIRES SEPT. 16, 1985

RW/wjs

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

DUQUESNE LIGHT COMPANY

By J. J. Carey
J. J. Carey
Vice President

COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF BEAVER)

On this 24th 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.

Sheila M. Fattore
Notary Public

SHEILA M. FATTORE, NOTARY PUBLIC
SHIPPINGPORT BORO, BEAVER COUNTY
MY COMMISSION EXPIRES SEPT. 16, 1985
Member, Pennsylvania Association of Notaries

WALTER W. LATTOR, Notary Public
Shirlington Road, Fairfax County,
VA. Commission Expires Sept. 16, 1982
Member, Pennsylvania Association of Notaries

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