

APPENDIX B

NOTICE OF DEVIATION

Duquesne Light Company
Beaver Valley Power Station, Unit 2

Docket No. 50-412
License No. CPPR-105

As a result of the inspection conducted on October 23 - November 2, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following deviation was identified:

FSAR, Table 1.8-1 commits to follow the guidance of Regulatory Guide 1.29, Revision 3.

Regulatory Guide 1.29, Regulatory Position 2 requires those portions of structures, systems, or components whose failure could reduce the functioning of any safety-related system to an unacceptable safety level should be designed and constructed so that a Safe Shutdown Earthquake (SSE) would not cause such failure. Regulatory Position 4 further requires that the pertinent quality assurance requirements of 10 CFR 50, Appendix B be applied to all activities affecting the safety-related functions of those structures, systems, and components.

Contrary to this, as of November 15, 1985, monorail systems were installed above safety-related systems such as the high head safety injection pumps, so that their failure could reduce the functioning of the high head safety injection safety-related system to an unacceptable safety level. These monorail systems were not designed and constructed so that a Safe Shutdown Earthquake would not cause failure. The pertinent quality assurance requirements of 10 CFR 50, Appendix B were not applied to construction activities affecting the safety-related functions of the monorail systems. Visual inspection of certain portions of these monorail systems revealed questionable construction practices, particularly in the quality of the welds. Apparent porosity and undercut was observed.

You are requested to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective actions taken (or planned); (2) the results achieved; and (3) the date when corrective action will be completed.

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