

APPENDIX A  
NOTICE OF VIOLATION

Duquesne Light Company

Docket No. 50-334

This refers to the inspection conducted by representatives of the Region I (Philadelphia) office at the Beaver Valley Power Station, Unit 1, Shippingport, Pennsylvania, of activities authorized by NRC License No. DPR-66.

During this inspection conducted on November 5-9, 1978, the following apparent items of noncompliance were identified. These items are infractions.

A. Technical Specification 4.7.8.1.b requires, in part, that each Supplemental Leak Collection and Release System (SLCRS) exhaust air filter train be demonstrated operable after each complete or partial replacement of a HEPA filter or charcoal adsorber bank by:

1. Verifying that the charcoal adsorbers remove  $> 99\%$  of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the ventilation system at a flow rate of 36,000 cfm  $\pm 10\%$ .
2. Verifying that the HEPA filter banks remove  $> 99\%$  of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the ventilation system at a flow rate of 36,000 cfm  $\pm 10\%$ .
3. Subjecting the carbon contained in at least one test canister or at least two carbon samples removed from one of the charcoal adsorbers to a laboratory carbon sample analysis and verifying a removal efficiency of  $> 90\%$  for radioactive methyl iodide at an air flow velocity of  $1.35 \text{ ft/sec} \pm 20\%$  with an inlet methyl iodide concentration of  $0.05 \text{ to } 0.15 \text{ mg/m}^3$ ,  $> 95\%$  relative humidity, and  $> 125^\circ\text{F}$ ; other test conditions shall be in accordance with USAEC RDT Standard M-16-1T, June 1972.

Contrary to the above requirement, both SLCRS charcoal adsorber banks were replaced on March 21-22, 1978, and subsequently the reactor was operated during the period April thru July 1978, without tests 2 and 3 (above) having been performed as required. Tests of the HEPA filters had not been performed and the tests of carbon samples had been performed at an improper face velocity and methyl iodide concentration.

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B. Technical Specification (TS) 6.11, "Radiation Protection Program," requires that "procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure."

1. Radcon procedure 4.1, "Requirements for setting up a frisker station," developed pursuant to TS 6.11, requires in step 3.2.1 that the alarm be set at a point 100 cpm above general background.

Contrary to the above requirement, on November 5, 1978, four friskers at the exit of the radiation control area had alarm setpoints greater than 100 cpm above general background. Three of the four were set at 400 cpm above general background; the fourth was set at 300 cpm above general background.

2. Radcon procedure 10.1, "Respiratory Equipment," developed pursuant to TS 6.11, requires in step 3.1.2 that as respiratory equipment is issued it shall be logged on the Respiratory Equipment Log. In step 3.7 it states that it is the responsibility of the individual to whom respiratory equipment is issued to return the equipment to the issue point after each use (except when Radcon designates otherwise) and to assure that the equipment is logged back in.

Contrary to the above requirements, at least 363 respirators logged out in August and September had not been logged in; 26 of these were improperly logged in that no name was logged on the log sheet; 43 of these were improperly logged in that no respirator type was logged at the time of issue.

- C. Environmental Technical Specification 2.4.2.3 requires in part for liquid effluent discharges that "Prior to taking samples from a monitoring (test) tank, at least two tank volumes of entrained fluid shall be recirculated through the mixing eductors."

Contrary to the above requirement, samples used to evaluate liquid effluent discharges were taken without the required two tank volumes of recirculation on May 20, May 21, May 25, and July 21, 1978.