



Duquesne Light

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November 28, 1978

United States Nuclear Regulatory Commission
Attention: Mr. Boyce H. Grier, Director
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Reference: Beaver Valley Power Station, Unit No. 1
Docket No. 50-334
License No. DPR-66
IE Inspection Report 50-334/78-26

Dear Mr. Grier:

In response to your letter of November 3, 1978 and in accordance with 10 CFR 2.201, the attached reply addresses the Notice of Violation which was included as Appendix A of the referenced Inspection Report. The noted violation was the failure to comply with Equipment Control Procedures.

Your letter noted that immediate action steps corrected the item of noncompliance at the time of the inspection. Therefore, only the steps that have been taken to avoid recurrence of the item are addressed in our reply.

Duquesne Light shares your concerns over the recurrent item and believes that the actions taken to date will assure against further items of non-compliance.

Also attached is the information requested concerning a timely resolution on items 334/78-26-01, 02, and 03.

Very truly yours,

C. N. Dunn

C. N. Dunn
Vice President, Operations

Attachment

7901020506

DUQUESNE LIGHT COMPANY
Beaver Valley Power Station
Unit No. 1

REPLY TO NOTICE OF VIOLATION
Inspection No. 78-26
Letter Dated November 3, 1978

Description of Infraction (78-26-08)

Technical Specification 6.8.1 states in part: Written procedures shall be . . . implemented . . . covering the activities referenced below: . . . The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, November 1972 . . ." Appendix A of the Regulatory Guide recommends in part that "Administrative Procedures" for "Equipment Control" be established.

The Beaver Valley Power Station Operating Manual, Chapter 1.48, Section 6 requires that Equipment Clearance Permit Logs be established and kept up to date, including identification of those Equipment Clearance Permits which have been completely signed off. The Beaver Valley Power Station Operating Manual, Chapter 48, Section 5 requires that a valve status board be maintained in the control room for all safety-related systems and that the status board be maintained up to date at all times.

Contrary to the above, on October 6, 1978, the procedures of the Operating Manual were not properly implemented in that:

- Three of eighteen Equipment Clearance Permits sampled were identified in the Equipment Clearance Permit Log sheets as being active when the Permits had been completely signed off and forwarded for permanent filing prior to the inspection;
- Thirteen of eighteen Equipment Clearance Permits sampled did not have the status of their abnormally positioned valves indicated on the respective valve status boards; and,
- The valve status board indicated that valves RC-68, RC-69 and DG-249 were danger tagged shut when in fact the associated Equipment Clearance Permits and tags had been cleared on September 27, 1978.

Corrective Steps Taken to Avoid Further Items of Noncompliance

A letter has been sent to the Shift Supervisors to remind operations personnel of the importance of maintaining the Equipment Clearance Log up to date.

An investigation was undertaken to determine the cause of the recurrent problem related to the upkeep of the valve status board. This investigation revealed that the procedures related to the valve status board were adequate for steady state power operation

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Corrective Steps Taken to Avoid Further Items of Noncompliance (continued)

but inadequate to accommodate all plant conditions, plant shutdown being one example. As a result of this inadequacy, adherence to the procedures was extremely difficult during some plant conditions such as plant shutdowns. Revisions were made to the procedures to allow the necessary operating flexibility and accommodate all plant conditions.

DUQUESNE LIGHT COMPANY
Beaver Valley Power Station
Unit No. I

ADDITIONAL INFORMATION REQUESTED
Inspection No. 78-26
Letter Dated November 3, 1978

In response to your request for a schedule for corrective action on unresolved items 78-26-01, -02, and -03 the following is proposed.

1. Immediate Action: The Power Station Engineering Group (PSEG) has been directed that design performance of all Category I modifications shall be assigned to the Duquesne Light Company Engineering Department. This shall include any changes to design deemed necessary during installation. This action shall assume control of Category I modifications during the interim period until the establishment of the onsite design group under the administrative control of the E & C Division.
2. November 30, 1978 - Initiation of transmitting of completed design change records to the Beaver Valley Project Team for record update. It is expected that the initial effort will be directed toward completed Category I design change packages.
3. January 31, 1979 - Complete revision of Station Engineering Procedures to satisfy the unresolved items as delineated in NRC Inspection 50-334/78-26 and Duquesne Light Company Quality Assurance Audit BV-1-78-17 referenced in the NRC Inspection.
4. February 28, 1979 - Completion of transmitting all completed Category I design change records to the Beaver Valley Project Team for records update.
5. May 31, 1979 - Complete transmitting all non-safety related design change package records to the Beaver Valley Project Team for records update.

It is our understanding that the completion of these items will bring the design change control program in compliance with ANSI N45.2.11.