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April 29, 1980

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Attn: Boyce H. Grier, Regional Director
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 No. 80-01

Dear Mr. Grier:

In response to your letter dated April 3, 1980, 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 violations were:

a. failure to maintain certain radiation monitoring instrumentation within specified limits while in Mode 6

b. failure to follow procedures in aligning sample system after sampling evolutions

c. failure to control temporary jumpers and lifted leads in accordance with approved procedures

d. failure to periodically perform recalibrations in accordance with approved procedures

We have reviewed the referenced inspection report for 10 CFR 2.790 information and none were identified.

If you have any questions concerning this response, please contact my office.

Very truly yours,

C. N. Dunn
Vice President, Operations

Attachment

DUQUESNE LIGHT COMPANY
Beaver Valley Power Station
Unit No. 1

Reply to Notice of Violation
Inspection 80-01
Letter Dated April 3, 1980

Description of Infraction (80-01-02)

Technical Specification 3.3.3.1 states, "The radiation monitoring instrumentation channels shown in Table 3.3-6 shall be OPERABLE with their alarm/trip setpoints within the specified limits."

Contrary to the above, while in Mode 6 on January 23, 1980, the actual alarm/trip setpoint for containment area monitors, RM-VS-104A and RM-VS-104B and containment process monitor, RM-215B, exceeded the allowable limits specified in Technical Specification Table 3.3-6 as follows:

| | T.S. Limit | Actual Setting |
|---|---|---|
| RM-215B (Containment Gaseous Activity) | $\leq 7.3 \times 10^2$ cpm* | $8 \times 10^3$ cpm |
| RM-VS-104A (Containment Area Monitor) | $\leq 1.6 \times 10^3$ cpm* | $9.25 \times 10^3$ cpm |
| RM-VS-104B (Containment Area Monitor) | $\leq 1.6 \times 10^3$ cpm* | $9.34 \times 10^3$ cpm |

*Counts above background.

Background for RM-215B was approximately 200 cpm and for RM-VS-104A and B were approximately 100 cpm and approximately 200 cpm, respectively.

Corrective Action

The requirement to reset the alarm/trip setpoint for Mode 6 operation was contained in the Radcon manual and was overlooked by Radcon personnel. Operating Manual Change Notice (OMCN No. 80-15), was issued to OST 1.49.3 to provide an additional check of the alarm/trip setpoint.

Action To Prevent Recurrence

The Radiological Control Daily Log sheets will be revised to include entering of the operational mode on a shift basis. Instructions will be provided on the log sheets that indicate Technical Specification requirements for alarm setpoints prior to entering Mode 6 for the Radiation Monitoring System (RMS) Channels. Radcon Instrument Procedure 2.1 will be revised to clarify the required alarm setpoints for the RMS Channels. The requirements of Technical Specification 3/4 3.3 will be reviewed by all Radcon personnel with the Radcon Supervisors. The procedure revisions and personnel review will be completed by June 15, 1980. It is felt that with the radcon procedure revisions and the addition of an additional check by operations, the Operating Surveillance Test will prevent recurrence.

Date On Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.

Description of Infraction (80-01-06)

Technical Specification 6.8.1 states, in part, "Written procedures shall be established, implemented and maintained covering the activities referenced below: ...c. Surveillance and test activities of safety related equipment..." The BVPS Chemistry Manual, Chapter 3, Sampling and Testing, Part 7, Reactor Plant Sample System, Revision 1, provides the procedures for drawing reactor coolant samples required to satisfy Technical Specification surveillance requirements & provides detailed valve manipulations to return the primary sample sink to a normal valve lineup upon the completion of sampling evolutions.

Contrary to the above, on February 7, 1980, following a sampling evolution from the Residual Heat Removal System, the plant chemist failed to follow the approved Chemistry Manual procedures in that the primary sample flow path was secured by shutting only one valve rather than performing the alignment required by the procedure.

Corrective Action

Chemistry personnel were verbally cautioned followed with a written memorandum as to the importance of following procedures. Temporary changes have been effected to the Chemistry Manual to better define the purging method and the proper valve alignment to be used during the shutdown mode.

Action Taken To Prevent Recurrence

A permanent revision to the Chemistry Manual will be in effect by May 31, 1980.

Date On Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.

Description of Infraction (80-01-04)

Technical Specification 6.8.1 states, in part, "Written procedures shall be established, implemented and maintained covering the activities referenced below: a. The applicable procedures recommended in Appendix A to Regulatory Guide 1.33, November 1972..." Appendix A to Regulatory Guide 1.33, November 1972 recommends that procedures be established for "...A.10 Bypass of Safety Functions and Jumpers..." The BVPS Operating Manual, Chapter 1.48.5.D.h, Jumpers and Lifted Leads, Revision 7, states in part, "...c. Where temporary jumpers are installed...in troubleshooting equipment that has been cleared and tagged for maintenance, no documentation (tagging and logging) is required, but the guidelines of Section 5.D.3 must be followed to preclude restoring the equipment to operable status without restoring it to its original position. If the equipment must be returned to service with temporary jumpers...then the procedures of Section 5.D.2 must be followed..." Section 5.D.3 provides general instructions for the physical installation of jumpers including type of wire to be used, etc. Section 5.D.2 describes the control of temporary jumpers including the requirements for identification, tagging and logging, and authorization of temporary jumpers.

Contrary to the above, on January 16, 1980, a temporary jumper was installed with alligator clips on RCS temperature recorder T-RC-448B, Terminals 9(+) to 9(-). No temporary jumper tag was installed on the equipment and no log entry was present in the Jumper and Lifted Lead Log maintained by the Shift Supervisor. The temporary jumper had apparently been installed during authorized maintenance in accordance with OM Chapter 1.48.5.D.1.c but had not been removed or properly logged at the completion of that maintenance.

Corrective Action

The jumper was immediately removed upon notification by the inspector.

Action Taken To Prevent Recurrence

The I&C technicians will be instructed by May 2, 1980, on the proper use of jumpers with emphasis on the use of jumpers during troubleshooting.

Date On Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.

Description of Infraction (80-01-03)

10 CFR 50, Appendix B, Criterion XII states, in part: "Measures shall be established to assure that...instruments and other measuring and test devices used in activities affecting quality are properly controlled, calibrated and adjusted at specified periods to maintain accuracy within necessary limits."

The BVPS FSAR, Appendix A.2.2.12, Control of Measuring and Test Equipment, states, in part, "The Operations Quality Assurance Program establishes measures to assure that... instruments and other measuring and testing devices used in activites affecting quality are properly controlled, calibrated and adjusted at specified periods or prior to use to maintian accuracy within necessary limits. Specific procedures shall include the identification of the calibration techniques, the calibration frequency and the method for tagging of measuring devices to positively indicate their status... The Operations Quality Assurance Program requires that all measuring and test equipment shall be calibrated on or before the calibration due date..." The BVPS Maintenance Manual, Chapter 1, Section 0, Calibration Program, Revision 4, Paragraph 4.b states, in part, "...Each instrument that requires a periodic calibration and/or functional check is assigned a frequency as follows: ...b. Other instruments subject to calibration per the QA Program were assigned their frequencies based upon the Onsite Safety Committee's recommendations (See the list of instruments to be calibrated per the QA Program: Appendix IV, this section). These "Other instruments are any instruments which are used to quantitatively verify operability of a safety related system..." Appendix IV above includes the instuments listed below, except LI-FP-202, and specifies an eighteen month calibration frequency for each.

Contrary to the above, on January 24, 1980, the instruments listed below were noted to have been due for the required periodic recalibration in November 1979 but had not yet recalibrated. Additionally, the inspectors were unable to identify the existence of a calibration procedure or specified calibration frequency for instrument LI-FP-202. The instruments so noted are:

| | |
|---|---|
| PI-63-FPC2 | Cardox Pressure - Main Cardox Fire Protection Unit |
| LI-FP-202 | Cardox Level Indicator - Main Cardox Fire Protection Unit |
| PI-EE-205 | EDG Fuel System 1 Filter In |
| PI-EE-206 | EDG Fuel System 1 Filter In |
| PI-EE-207 | EDG Fuel System 2 Filter In |
| PI-EE-208 | EDG Fuel System 2 Filter In |
| PI-EE-209 | EDG Lube Oil Engine |
| PI-EE-210 | EDG Lube Oil Engine |
| PI-EE-211 | EDG Lube Oil Filter |
| PI-EE-212 | EDG Lube Oil Filter |

Corrective Action

The affected instruments have been calibrated with acceptable results. LI-FP-202 has been placed on a calibration frequency in accordance with the QA Program.

Action Taken To Prevent Recurrence

The format for the computer scheduling cards will be charged to make the required calibrations more distinguishable from those that are not required. This format change will be completed by May 30, 1980.

Date On Which Full Compliance Will Be Achieved

Full Compliance has been achieved at this time.