



**Duquesne Light**

435 Sixth Avenue  
Pittsburgh, Pa.  
15219

(412) 456-6000

January 7, 1981

United States Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Attn: Eldon J. Brunner, Chief  
Reactor Operations and Nuclear Support Branch  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Reference: Beaver Valley Power Station, Unit No. 1  
Docket No. 50-334, License No. DPR-66  
IE Inspection 80-28

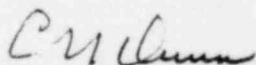
Dear Mr. Brunner:

In response to your letter dated December 12, 1980 and in accordance with 10 CFR 2.201, the attached reply addressed the Notice of Violation which was included as Appendix A of the above referenced Inspection Report. The noted violation, which has been classed as a deficiency, consisted of failure to complete a Manual Chapter Notice Form even though field revisions had been made to Maintenance Surveillance Procedures.

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

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

Very truly yours,

  
C. N. Dunn  
Vice President, Operations

Attachment

cc: U.S. Nuclear Regulatory Commission  
c/o Document Management Branch  
Washington, DC 20555

Mr. D. A. Beckman  
U.S. Nuclear Regulatory Commission  
Beaver Valley Power Station  
Shippingport, PA 15077

8103050343

DUQUESNE LIGHT COMPANY  
Beaver Valley Power Station  
Unit No. 1

REPLY TO NOTICE OF VIOLATION  
Inspection No. 80-28  
Letter dated December 12, 1980

DEFICIENCY

Description of Deficiency

Technical Specification 6.8.3 states, in part:

"Temporary changes to procedures...may be made provided:...

- c. The change is documented, reviewed by the OSC and approved by the Plant Superintendent within 7 days of implementation."

Beaver Valley Power Station Administrative Procedures, Chapter 11, regarding on-the-spot revisions states, in part:

"The revision will be made on a Manual Chapter Notice form which will indicate the date, time, change number, supervisor's name and the signature of the person making the change."

Contrary to the above, working copies of MSP 1.15A, Reactor Trip and ESF Logic Time Response, Revision 0, effective August 6, 1980 reviewed for Train A and Train B on October 17, 1980 had no documented Manual Change notices, although the written procedures bore many changes and personnel involved with the tests stated that on-the-spot changes were made.

Corrective Action Taken

The revised procedures were reviewed and it was determined that the field revisions were properly executed with the exception of the generation of the Manual Change form. The completed procedures were reviewed by the Onsite Safety Committee (OSC) and the OSC concurred with the work that was performed. The Maintenance Manual/Procedure Change Request form has been completed as required.

Action Taken to Prevent Recurrence

The circumstances surrounding this item were reviewed with the Instrument Engineer and other appropriate Station management and it was emphasized that the requirements of the Station Administrative Procedures requiring the completion of a Manual Change form and any further actions as required by the Station Administrative Procedures and the Maintenance Manual must be followed.

Date on Which Full Compliance Will be Achieved

Full compliance has been achieved at this time.