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DUQUESNE LIGHT COMPANY Beaver Valley Power Station Post Office Box 4 Shippingport, PA 15077

September 23, 1980 BVPS:JAW:981

Beaver Valley Power Station, Unit No. 1 Docket No. 50-334, License No. DPR-66 LER 80-070/01P

Mr. B. H. Grier, Director of Regulation United States Nuclear Regulatory Commission Region 1 631 Park Avenue King of Prussia, Pennsylvania 19406

Dear Mr. Grier:

In accordance with Appendix A, Beaver Valley Technical Specifications, Licensee Event Report LER 80-070/01P, Technical Specification 6.9.1.8.d, Administrative Controls, is submitted. This occurrence was reported to the Beaver Valley NRC Resident Inspector Mr. D. A. Beckman at 0110 hours on September 23, 1980.

From 0545 hours to 1240 hours on September 22, 1980, the Reactor Coolant System initial fill and vent was in progress. The reactor coolant sample taken at 1648 hours on September 22, 1980 showed a boron concentration of 1701 ppm while the previous day's sample showed 1964 ppm. This dilution resulted in a reactivity insertion of 3% $\Delta k/k$ which is greater than the 0.5% $\Delta k/k$ Technical Specification administrative limit for an unplanned reactivity insertion.

The shutdown margin was calculated to be 6.8% $\Delta k/k$ which is greater than the administrative minimum of 5% $\Delta k/k$ and the Technical Specification minimum of 1% $\Delta k/k$.

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This dilution was caused by a procedural deficiency. The manual emergency boration flow path was open for Train "A" priority. This flow path allows the boric acid pump discharge flow to bypass the boric acid blender. The boric acid blender procedure did not account for this condition and the blender's automatic controls raised the primary grade water flow to an amount equal to the missing boric acid flow. This extra primary grade water caused the unplanned dilution.

The total flow setpoint of the blender has been changed to produce the desired water flow for the calculated mix. The blender operating procedure has been changed to require a setpoint change when the manual emergency boration flow path is in service.

Very truly yours,

J. A. Werling Superintendent

cc: Director Of Management & Program Analysis United States Nuclear Regulatory Commission Washington, D. C. 20555

W. J. Ross, BVPS Licensing Project Manager United States Nuclear Regulatory Commission Washington, D. C. 20555

D. A. Beckman, Nuclear Regulatory Commission, BVPS Site Inspector

P. Higgins, Secretary, Prime Movers Committee - EFI

Nuclear Safety Analysis Center, Palo Alto, California

Mr. John Alford, PA Public Utilities Commission, Harrisburg, PA