

U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION I

Report No. 50-334/80-21 (Ops)

Docket No. 50-334

License No. DPR-66 Priority -- Category C

Licensee: Duquesne Light Company

435 Sixth Avenue

Pittsburgh, Pennsylvania 15219

Facility Name: Beaver Valley Power Station, Unit 1

Meeting At: USNRC, Region I, King of Prussia, Pennsylvania

Meeting Conducted: July 18, 1980

Inspectors: *Edward A. Beckman*
D. A. Beckman, Senior Resident Inspector

8-8-80
date

date

date

Approved by: *Edward A. McCabe, Jr.*
E. C. McCabe, Jr., Chief, Reactor Projects
Section No. 2, RO&NS Branch

8-8-80
date

Meeting Summary:

July 18, 1980 (Management Meeting Report No. 50-334/80-21 (Ops))

Special meeting convened by Region I management to discuss NRC concerns regarding licensee implementation of administrative controls, licensee action taken in response to recent incidents involving outage recovery activities and plant staff work hours. The meeting was attended by senior licensee and Region I management and also involved discussions of the licensee's physical security program (reported separately).

DETAILS

1. Attendees

Duquesne Light Company

J. Carey, Director of Nuclear Operations
W. Delmer, Security Assistant
C. Dunn, Vice President, Operations Division
J. Mauer, Superintendent of Personnel, Power Stations Department
J. McCloskey, Director of Personnel, DLC
G. Moore, General Superintendent, Power Stations Department
M. Siegel, Supervisor, Onsite Engineering Group, BVPS
R. Swiderski, Superintendent of Construction, BVPS
R. Washabaugh, Manager of Quality Assurance
J. Werling, Superintendent, BVPS Unit 1

U.S. Nuclear Regulatory Commission

J. Allan, Deputy Director, Region I
D. Beckman, Senior Resident Inspector, Reactor Operations and Nuclear Support Branch, Region I
E. Brunner, Chief, Reactor Operations and Nuclear Support Branch, Region I
E. McCabe, Jr., Chief, Reactor Projects Section No. 2, Reactor Operations and Nuclear Support Branch, Region I
W. Ross, Licensing Project Manager, Office of Nuclear Reactor Regulation

Other members of the Region I staff participated in the portion of the meeting concerning the licensee's physical security program (reported separately).

2. Meeting Summary

Opening remarks made by regional management summarized the NRC Region I concerns. The nature of this meeting was characterized as preventive enforcement based upon the results of recent inspections and the potential for future safety problems. The goal of the meeting was stated to be the projection of NRC concerns to licensee management.

a. Administrative Controls - Operations

(1) Procedure Adherence

During recent inspections, Region I identified activities in the facility's administrative procedures for operations which had apparently resulted in misinterpretation of regulatory

requirements for operator adherence to approved procedures for activities which affect safety of the core, radiological safety, and the quality of operation. The facility license requires compliance with the procedure adherence and procedure change requirements of Technical Specifications; Regulatory Guide 1.33, Quality Assurance Program Requirements (Operation), 1972; and ANSI N18.7, Administrative Controls for Nuclear Power Plants, 1972.

The following areas of concern were discussed:

- The BVPS Operating Manual, used by the operators, does not appear to provide sufficiently specific guidance regarding adherence to procedures, with the apparent result being deviation from approved procedures without processing suitably approved changes prior to conducting deviating evolutions.
- The licensee's requirements for logging of operations, including procedure identification or procedure deviations, appear ambiguous and do not result in quality assurance records which accurately reflect compliance with approved procedures or which identify the occurrence of deviations.
- The licensee's administrative procedures for the performance of simple, one-time evolutions not addressed by existing procedures appear ambiguous with respect to when an approved procedure is required, to document when a procedure is not required, and to the systems, components, and structures for which the guidance/ requirements apply.
- Discussions between NRC inspectors and licensee operators have indicated a lack of clear understanding of the above issues as they relate to the regulatory requirements involved.

Region I management expressed concern for the consistent control of plant operations without improvement in the above administrative controls. Licensee representatives stated that the matters above were currently under review and would be the subject of additional licensee management attention. The licensee expressed concern with literal application of the regulatory requirements which could result in limiting the ability of the station operators to flexibly respond to unique plant conditions or system configurations and thereby impede operations and accomplishment of work. The NRC representatives present acknowledged the above and stated that these administrative controls assure that proper supervisory/managerial review is applied to operations

which affect safety and, as such, were considered as an essential part of the quality assurance program for operation. (Procedural controls do not prevent placing the plant in a safe condition. They assure that operator evolutions are preplanned and approved as much as is practicable in order to maximize safety).

This matter will continue to be reviewed by NRC:RI and will be discussed in IE Inspection Report 50-334/80-20.

(2) Control of Outage Recovery Activities

The facility is currently undergoing an extensive modification outage and is entering the outage recovery phase during which modified or maintained systems are being returned to service and tested in preparation for plant startup. As discussed in IE Inspection Report 50-334/80-20, several recent plant incidents have resulted in the inadvertent spillage or transfer of potentially radioactive water within the plant. Although the specific incidents had negligible safety consequences, they appear to indicate weaknesses in the coordination and control of system restoration operations. These incidents appeared to illustrate a need for improvement in the following areas:

- Additional, improved communication between organizations responsible for modifying, maintaining, testing or operating systems or components to ensure that all work is complete and system integrity is adequate to support the plant evolutions.
- Identification of individual(s) responsible for assuring that prerequisite activities have been properly completed and documented prior to beginning the evolution, thus providing assurance that incomplete work will not adversely affect the safety of an operation.
- Improvement in the quality and level of attention directed at the initial fill, operation, or energization of equipment to ensure that any unexpected condition or system response is immediately identified and mitigated, e.g. additional attention to potentially radioactive liquid transfers to promptly identify inadvertent spillage or incorrect routing.

Licensee management acknowledged the NRC concerns and stated that actions being taken in response to the high level of plant recovery activity and the problems discussed above include: assignment of a second Senior Operator (Shift Supervisor) to each shift; providing additional guidance to operators regarding the need for increased attention and care to outage recovery evolutions; emphasis on the

authority of operations personnel to control the number and pace of such evolutions to that which is safely achievable; and, the consideration of future assignments of training instructors onshift to augment shift personnel training and provide additional supervisory assistance and capability. Licensee management stated that the recent incident history had been reviewed and considered the above actions to be responsive to the problems identified by their reviews.

b. Plant Staff Work Hours

Inspection and Enforcement Circular No. 80-02, Nuclear Power Plant Staff Work Hours, issued February 1, 1980, provides guidance for the control of work hours for personnel performing a safety-related function in order to minimize the effect of fatigue on safety. During IE Inspection 50-334/ 80-20, contacts with plant personnel and review of plant records indicated that the recommendations and guidance of the Circular were not being consistently applied and that licensee management did not consider their application to be viable. Although inspection did not specifically identify a degradation in the safety posture of the facility due to work hours-induced fatigue, it was found that a significant fraction of station personnel were working or had worked hours in excess of the recommendations.

The licensee stated that their management assessment of the existing requirements, policies and practices did not identify a significant hazard to safety resulting from work hour-induced fatigue. The licensee further stated that company policy required minimization of extended work hours and overtime; that such policy was strictly enforced; and that the overriding majority of personnel at BVPS were working within the Circular's guidelines.

NRC management informed the licensee that the NRC is currently considering the issuance of new regulatory requirements which will implement administrative controls and limits for staff work hours. The licensee acknowledged their awareness of that planning and stated that the above subject will continue to be a subject of their review.