



**Duquesne Light**

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October 13, 1980

United States Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Attn: Mr. Eldon J. Brunner, Chief  
Reactor Operations and Nuclear Support Branch  
Region 1  
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 80-16

Dear Mr. Brunner:

In response to your letter dated September 17, 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. These three items have been identified as infractions and consist of the following:

1. failure to notify the NRC Operations Center of a possible intruder inside the Protected Area
2. failure to maintain procedures to control out-of-service radiation survey instrumentation
3. failure to complete corrective action documentation regarding specific instructions presented for maintenance activities and for the inclusion of the Cardox level indicator calibration frequency in the Maintenance Manual.

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We have reviewed the referenced inspection report for 10 CFR 2.790 information. We consider some portions of the report to be exempt from public disclosure and have identified them via separate correspondence. However, no 10 CFR 2.790 information has been included in this response.

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

Very truly yours,

C. N. Dunn  
Vice President, Operations

Attachment

cc: Mr. D. A. Beckman, Resident Inspector  
U.S. Nuclear Regulatory Commission  
Beaver Valley Power Station  
Shippingport, Pennsylvania 15077

U.S. Nuclear Regulatory Commission  
c/o Document Management Branch  
Washington, D.C. 20555

DUQUESNE LIGHT COMPANY  
Beaver Valley Power Station  
Unit No. 1

REPLY TO NOTICE OF VIOLATION  
Inspection No. 80-16  
Letter Dated September 17, 1980

INFRACTION A

Description of Infraction (80-16-04)

10 CFR 50.72(a)(4) requires, in part, that the licensee notify the NRC Operations Center as soon as possible and in all cases within one hour of any act that threatens the safety of the nuclear power plant or site personnel, or the security of special nuclear material, including instances of sabotage or attempted sabotage.

Contrary to the above, on June 25, 1980, when licensee personnel had reason to believe that an intruder may have penetrated the Protected Area, but had not conclusively established that no intrusion had taken place, the licensee did not notify the NRC Operations Center.

Discussion of Infraction

The circumstances which led to the suspicion that an intrusion into the Protected Area had taken place could not be verified and there was no physical evidence that an intrusion, in fact, did or might have taken place. The recently established amendment to 10 CFR 50.72(a)(4) was interpreted by shift and security personnel to require notification of the NRC Operations Center if the act which threatened safety or security could be confirmed to have occurred. 10 CFR 50.72(a)(4) was not interpreted at the time to require reporting of security incidents which could not be confirmed and which appeared to represent no security threat.

Corrective Action Taken

Shift Supervisors have been informed that events of this nature require NRC notification whether the threat is confirmed or suspected.

Action Taken To Prevent Recurrence

Shift Supervisors have been directed by the Station Superintendent, in writing, to notify the NRC Operations Center of any future safeguard events whether confirmed or suspected.

Data On Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.

INFRACTION B

Description of Infraction (80-16-05)

Technical Specification 6.11, Radiation Protection Program, states: "Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

Contrary to the above, procedures to control out of service radiation survey instrumentation were not maintained; in that the existing procedure was deleted in RCM Appendix 10, Section II.B.3 Radcon Instrument Deficiency Log, Revision 10, on March 29, 1980 even though the revised procedure incorporated in the Radiation Control Manual, Appendix 1, Radcon Administrative Guide, Revision 9, could not yet be implemented.

Corrective Action Taken

At the time the existing procedure was deleted, a single individual was assigned, on a full time basis, to control Out Of Service instruments as a positive means of assuring complete control of these instruments. As noted in the inspection report, this was an interim step taken while awaiting the arrival of vendor supplied tags which were needed to implement the new procedure. Upon receipt of the new Out Of Service tags, the new procedure was implemented.

Action Taken To Prevent Recurrence

In the future, when materials from outside vendors are required to fulfill procedure requirements, the materials will be on site prior to procedure implementation or deletion.

Date On Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.

INFRACTION C

Description Of Infraction (80-16-06)

10 CFR 50, Appendix B, Criterion XVI, Corrective Action, states in part: "Measures shall be established to assure that conditions adverse to quality...are promptly identified and corrected. ...The identification of ...the corrective action taken shall be documented and reported to appropriate levels of management." Quality Assurance Program OP-13, Revision 4, Section 13.3.4, states in part: "...records shall be maintained to show objective evidence of action taken to correct conditions adverse to quality. The records shall document...the implementation of corrective measures." OP-13, Revision 4, Section 13.3.1, also states in part: "A corrective action system shall be established to assure that significant conditions adverse to quality are promptly identified and corrected."

1. Contrary to the above, documentation of corrective actions was not accomplished for the training specified by the licensee's April 29, 1980, Notice of Violation response letter statement that "The I&C technicians will be instructed by May 2, 1980, on the proper use of jumpers with emphasis on the use of electrical jumpers during trouble-shooting;" in that inspector review conducted June 6, 1980 determined that the licensee failed to document corrective instruction provided to I&C technicians.
2. Contrary to the above, prompt corrective action was not taken as specified by the licensee's April 29, 1980 Notice of Violation response letter stating that "LI-FP-202 has been placed on a calibration frequency in accordance with the QA Program;" in that inspector review conducted June 6 and 11, 1980 determined that the Cardox level indicator (LI-FP-202) of the Main Cardox Fire Protection Unit had not been incorporated in Appendix IV to BVPS Maintenance Manual Chapter 1, Section 0, entitled, "Instruments to be Calibrated per the QA Program."

Corrective Action Taken

1. The training of the I&C technicians was reperformed on June 16, 1980 and the documentation was presented to the inspector for verification that the documentation for the corrective action was complete.
2. The Maintenance Manual, Chapter 1, Section 0, has been revised to incorporate LI-FP-202 into the manual effective June 30, 1980.

Action Taken To Prevent Recurrence

Documentation of and prompt corrective action of internal maintenance department items of noncompliance will be followed by one individual to assure compliance with 10 CFR 50, App. B, Criterion XVI. The work load resulting from open items on the Commitment Status Report had increased beyond manageable levels making it necessary to temporarily assign one individual to follow-up and complete all documentation required for corrective action on all commitments. This individual is assigned on an interim basis and will continue to provide prompt corrective action until the work load is reduced to a manageable level.

Date On Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.