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July 21, 1981

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. 80-27

Gentlemen:

In response to your letter of June 25, 1981, and in accordance with 10 CFR 2.201, the attached reply addresses the Notice of Violation which was included as Appendix A with the referenced inspection report.

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,

J. J. Carey

J. J. Carey
Vice President, Nuclear

Attachment

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

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

DUQUESNE LIGHT COMPANY
Beaver Valley Power Station

Reply to Notice of Violation
Appendix A
Inspection No. 80-27
Letter Dated June 25, 1981

VIOLATION A (80-27-01)

Description of Violation

Technical Specification (TS) 4.3.3.5, Remote Shutdown Instrumentation - Surveiliance Requirements, states, "Each Remote Shutdown Monitoring Instrumentation Channel shall be demonstrated operable by performance of the... Channel Calibration operations at the frequency shown in Table 4.3-6." TS Table 4.3-6 requires that Remote Shutdown Monitoring Instrumentation Pressurizer Level Channel Calibration be performed at least once per 18 months. 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...".

Contary to the above, on November 6, 1980, the written procedure for Channel Calibration of the Remote Shutdown Monitoring Instrumentation Pressurizer Level Channel Indicator No. LI-RC-460A was inadequately established, implemented and maintained in that:

-- Maintenance Surveillance Procedure (MSP) No. 6.42, L-460 Pressurizer Level Protection Channel II Calibration, Revisions 0 through 4, were established to calibrate the instrument loop which includes Remote Shutdown Monitoring Instrumentation Pressurizer Level Channel Indicator LI-RC-460A.

-- Neither the current (Revision 4) nor prior revisions of the procedure included instructions for calibration of Channel LI-RC-460A.

-- On November 6, 1980, Channel LI-RC-460A bore a calibration sticker indicating performance of a prior calibration on May 12, 1978, and a calibration due date of November 12, 1979. No other data or records of calibration were available to substantiate the information on the calibration sticker or which documented a subsequent channel calibration.

Corrective Action Taken

Maintenance Surveillance Procedure MSP 6.42 has been revised to include the calibration of LI-RC-460A. On January 11, 1981, this instrument was calibrated and the as found data was within the acceptance range.

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VIOLATION A (80-27-01) (continued)

Action Taken To Prevent Recurrence

The inclusion of LI-RC-460A in MSP 6.42 establishes the instrument calibration procedure. As part of the Maintenance Surveillance Program, the scheduling of the instrument calibration is automatically accomplished and appropriate calibration records will be properly maintained as required for safety related equipment.

Date On Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.

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VIOLATION B (80-27-02)

Description of Violation

10 CFR 50, Appendix B, Criterion V, states, in part, "Activities affecting quality shall be prescribed by documented...procedures or drawings of a type appropriate to the circumstances...". The BVPS FSAR, Appendix A, Section A.2.2.5, Instructions, Procedures, and Drawings, states, in part, "The Operations Quality Assurance Program requires that activities affecting quality shall be prescribed by documented...procedures or drawings of a type appropriate to the circumstances...Maintenance...(and) testing... activities which affect the quality or safety of Category I items are prescribed by documented...procedures or drawings...". Quality Assurance Procedure No. OP-8, Document Control, Revision 1, Section 8.2, states, in part, "Each Duquesne Light Company department performing activities affecting quality shall prepare documented...procedures or drawings prescribing these activities...".

Contrary to the above, on November 6, 1980, drawings applicable to Remote Shutdown Monitoring Instrumentation Pressurizer Level Channel Indicator LI-RC-460A were inappropriate to the circumstances (improperly maintained) in that:

-- Westinghouse Electric Corporation vendor drawings (nos. 5991D37, 5991D38, and 5991D39, no revision numbers) depict the instrumentation associated with Pressurizer Level Protection Channels I, II, and III, respectively. Channel LI-RC-460A is part of Pressurizer Level Protection Channel II. The drawings did not include Channel LI-RC-460.

-- Westinghouse Drawings Nos. 5991D37, 5991D38, and 5991D39 are incorporated in Maintenance Surveillance Procedure 6.42, L-460 Pressurizer Level Protection Channel II Calibration, Revision 4. This procedure is established to calibrate the instrument loop which includes Remote Shutdown Monitoring Instrumentation Pressurizer Level Channel LI-RC-460A.

-- No other facility drawings depicting Remote Shutdown Monitoring Instrumentation Pressurizer Level Channel LI-RC-460A could be identified.

Corrective Action Taken

The appropriate Westinghouse Electric Corporation vendor drawings incorporated in Maintenance Surveillence Procedure 6.42 have been revised to include LI-RC-460A.

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VIOLATION B (80-27-02) (continued)

Action Taken To Prevent Recurrence

The Station Aperature Card File contains drawing 1.31-235B-1 which identifies LT-RC-460A as part of the Pressurizer Level Protection, Channel II. We therefore have a controlled drawing which depicts the referenced level indicator. The referenced Maintenance Surveillence Procedure (MSP) does not use the attached Westinghouse prints within the body of the procedure and are therefore not required for performance of the MSP. They are however intended as a reference for the repairmen when the procedure is performed. Because it is desirable to provide accurate supplemental information, the MSPs which calibrate instruments on the Shut Down Panel are being reviewed to correct loop diagram inconsistencies. Any changes deemed necessary will be incorporated in the referenced drawings prior to their use.

Date On Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.

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VIOLATION C (80-27-03)

Description of Violation

Technical Specification (TS) 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."

The BVPS Radcon Manual (RCM), Radcon Procedure 2.4, Area Posting, Revision 1, Section 2.1, states: "High Radiation, Radiation, Airborne Radioactivity and Contamination Areas are posted in accordance with the BVPS-RCM and 10 CFR 20." Section 2.2 states: "Radiation and contamination zone codes are posted at area access points in accordance with BVPS-RCM."

BVPS Radcon Manual Procedure 2.1, Area Entry Requirements, Revision 6, Table 3.2.1.1, Radiation Controls, defines radiation zone codes and the applicable entry/control and posting requirements. Table 3.2.1.2, Contamination Controls, defines contamination zone codes and the applicable entry, posting, anti-contamination clothing, and respiratory protection requirements.

Contrary to the above, on October 15, 1980, an alternate access point to a Radiation Area - Radiation Zone Code 3 (greater than 15 - 50 mRem/hr), Contaminated Area - Contamination Zone Code B (greater than 450 uCi/100 cm^2 to 50,000 uCi/100 cm^2) was established without implementation of the above posting requirements. Specifically, a ladder and a removed section of handrail provided access to the Safety Injection Hydrostatic Test Pump platform on the 735 ft. elevation of the Primary Auxiliary Building. The normal access point to this area was properly posted. The temporary access point (via the ladder) was not posted nor was it attended by personnel responsible for controlling access.

Corrective Action Taken

The Radcon Foreman had the ladder removed and the handrails reinstalled thereby eliminating the alternate access point.

Action Taken To Prevent Recurrence

A chain barrier with appropriate posting has been installed at the alternate access point. In addition, the recently approved BVPS-RCM, Radiological Work Permit Procedure (RP 8.1) requires Radcon supervision to approve (by signature) all RWP's prior to implementation. If alternate access points are required for completion of work, the appropriate controls will be stated on the RWP.

Date On Which Full Compliance Will Be Achieved

Full compliance was achieved on July 1, 1981.

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VIOLATION D (80-27-07)

Description of Violation

Technical Specification 4.6.1.3.a, Containment Airlocks - Surveillance Requirements, states, in part, "Each containment airlock shall be demonstrated operable: a. After each opening, except when the airlock is being used for multiple entries, then at least once per 72 hours...". Technical Specification 3/4.6.1.3 is applicable in Operational Modes 1, 2, 3, and 4. Technical Specification 4.0.4, Surveillance Requirements, states, "Entry into an Operational Mode or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified." The Surveillance Requirements of TS 4.6.1.3.a are implemented by Operating Surveillance Test (OST) No. 1.47.1, Containment Airlock Test, Revision 22.

Contrary to the above, on October 22, 1980, the facility entered Mode 4 (Hot Shutdown) from Mode 5 (Cold Shutdown) without performance of Surveillance Requirement 4.6.1.3.a within the stated surveillance interval. Specifically, OST 1.47.1 had been performed on October 17, 1980, 11:23 a.m.; the facility entered Mode 4 on October 22, 1980, 4:55 a.m., an interval of about 113 hours after the last performance of the Surveillance Requirement. The airlock was being used for multiple entries during this period.

Corrective Action Taken

The airlock door was satisfactorily tested on the evening of October 22, 1980. This was noted in the Inspection Report.

Action Taken To Prevent Recurrence

The Operating Manual, Chapter 50, Section 3, Start-Up Checklist B has been revised. A note has been added for the performance of OST 1.47.1, Containment Air Lock Test, which states the surveillence requirement of performing this OST at least once per 72 hours. Additionally, space has been added to the Start-Up Checklist specifically for inclusion of the date each required OST was last performed.

Date On Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.

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VIOLATION E (80-27-10)

Description of Violation

Technical Specification 6.8.1, Procedures, states, in part, "Written procedures shall be...maintained covering the activities referenced below: a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November 1972...". Appendix "A" of Regulatory Guide 1.33, November 1972, states, in part, "C. Instructions for energizing, filling, venting, draining, startup, shutdown, and modes of operation should be prepared, as appropriate, for the following systems:...14. Chemical and Volume Control system...19.b(2) AC systems...".

Contrary to the above:

1. On October 7, 1980, the procedures of BVPS Operating Manual Section 1.7.4.K, Blender Automatic Makeup Operations, Revision 17, were inadequately maintained in that a temporary procedure change, Operating Manual Change Notice No. 80-175, was inadvertently deleted from the Shift Supervisor and Control Room controlled copies of the BVPS Operating Manual during insertion of Revision 18 of the above procedure. Operating Manual Change Notice No. 80-175 promulgated preventive action instructions for a prior Reactor Coolant System boron dilution incident; its subject matter had not been incorporated into Revision 18 of the procedure.

2. On October 29, 1980, pages 11, 12, 13, 15, 21, 22, 24, 25, 27, and 30 were missing from the Shift Supervisor controlled copy of the BVPS Operating Manual, Section 1.37.1, 480V Station Service System, Issue 1, Revision 5. The missing pages list and describe the 480V substations, power supplies, and load lists.

Corrective Action Taken

1. A copy of the OMCN was obtained and placed in each controlled copy of the Operating Manual.

2. As noted in the inspection report, the shift supervisor took immediate corrective action to have the missing pages reinserted.

Action Taken To Prevent Recurrence

1. As new revisions are issued to the Operating Manual they are annotated as to which OMCN's are to be removed as a result of the revision. The Operating Manual will be revised to reflect the method used to assure only those OMCN's are removed which have been incorporated in the issued revisions.

VIOLATION E (80-27-10) (continued)

2. The Station Operating Supervisor issued a notice to all operating personnel identifying this violation. Station operating personnel were directed to promptly replace any pages removed from a controlled copy of the BVPS Operating Manual.

Date On Which Full Compliance Will Be Achieved

1. Full compliance will be achieved by August 31, 1981.

2. Full compliance has been achieved at this time.