

APPENDIX A

NOTICE OF VIOLATION

Duquesne Light Company  
Beaver Valley Power Station, Unit 1  
License No. DPR-66

Docket No. 50-334

As a result of the inspection conducted on July 6 - August 3, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. Technical Specification (TS) 3.6.3.1 states in part, "The containment isolation valves specified in Table 3.6-1 shall be OPERABLE with isolation times as shown in Table 3.6-1. APPLICABILITY: Modes 1, 2, 3, and 4. ACTION: With one or more of the isolation valve(s) specified in Table 3.6-1 inoperable, either: ... b. Isolate the affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position, or ..." Table 3.6-1, Amendment 23, Item C.1 lists Containment Purge Exhaust valves VS-D-5-3A and -3B and requires a demonstrated isolation (closure) time of 8 seconds for both. The table also lists Containment Purge Exhaust valves VS-D-5-3A and -3B and requires a demonstrated isolation (closure) time of 8 seconds for both. The table also lists Item C.2, Containment Purge Supply valves VS-D-5-5A and -5B and requires demonstrated isolation times of 8 and 11 seconds respectively.

Technical Specification 3.0.4 states "Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements requirements. This provision shall not prevent passage through OPERATIONAL MODES as required to comply with ACTION requirements. Exceptions to these requirements are stated in the individual specifications".

Contrary to the above, on July 29, 1981, the facility entered into Operational Modes 4 and 3 while relying on Action b of Technical Specification 3.6.3.1 in violation of Technical Specification 3.0.4. Specifically:

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- Testing of the above Containment Purge & Exhaust containment isolation valves on July 24, 1981 in accordance with Operating Surveillance Test 1.1.10, Cold Shutdown Valve Exercise Test, Revision 23, established the individual valve isolation times to all be in excess of the requirements of Table 3.6-1. The unacceptable test results were apparently not identified to licensee supervision at the time of occurrence, but were identified by routine post-performance supervisory review about 10:40 a.m. on July 29, 1981.
- The valves were shut, their motor operators deactivated, and their manual operators locked prior to plant heatup from Mode 5 to Mode 4, thereby satisfying the requirements of TS 3.6.3.1, Action b.
- The facility entered Mode 4 from Mode 5 at 5:16 a.m., July 29, 1981, prior to licensee identification of the unacceptable test results and in coincidental compliance with the Action requirement. This constitutes a licensee identified example of noncompliance with TS 3.0.4.
- Upon identification of the above circumstances, licensee management directed control room operators to maintain the facility in Mode 4 (RCS Temperature less than 350° F) in accordance with TS 3.6.3.1 and 3.0.4, pending resolution of the valve isolation time deficiencies. Between 1:37 p.m. and 2:00 p.m., July 31, 1981, RCS temperature was inadvertently increased to 352-355°F, constituting entry into Mode 3 while still relying on TS 3.6.3.1, Action b, in violation of Technical Specification 3.0.4. This constitutes a second, inspector identified, example of noncompliance.

This is a Severity Level IV violation (Supplement I).

- B. Technical Specification 6.8.1, Procedures, states in part, "Written procedures shall be established, implemented, and maintained covering the activities referenced below:
- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November 1972...
  - c. Surveillance and Test activities of safety related equipment..."

Appendix A of Regulatory Guide 1.33, November 1972, Item B, General Plant Operating Procedures, recommends that procedures for "Startup -Cold to Hot" be established.

Contrary to the above, on July 29, 1981, procedures for plant heatup from cold conditions and procedures for administration of surveillance testing were inadequately established and maintained in that:

- BVPS Operating Manual, Section 1.50.3, Station Startup Checklists, Revision 22, did not include verification of acceptable results for Operating Surveillance Test (OST) 1.1.10, Cold Shutdown Valve Exercise, as a prerequisite for plant heatup from Mode 5 (Cold Shutdown) to Mode 4 (Hot Shutdown). OST 1.1.10 test valves required to be operable in Modes 1, 2, 3, and 4, and is at least partially performed during each Cold Shutdown period.
- Startup Prerequisites list, dated July 28, 1981 (DLC Memorandum No.BVPS:LGS:141) similarly did not address OST 1.1.10.
- BVPS Operating Manual, Section 1.55A.1, Periodic Checks - Operating Surveillance, Issue 1, Revision 4, provides instructions for performance, documentation and review of OSTs, but does not address prompt identification of unacceptable test results for partially completed tests. OST 1.1.10 was partially performed with unacceptable results for Containment Purge and Exhaust Valves Nos. VS-D-5-5A, -5B, -3A, and -3B on July 24, 1981. The unacceptable test results were not identified until July 29, 1981, after the facility has entered Operational Mode 4. The subject valves were required to be operable (acceptable test results) prior to entry into Mode 4.

This is a Severity Level IV Violation (Supplement I).

- C. Technical Specification 3.7.15, Penetration Fire Barriers, states "All penetration fire barriers protecting safety related areas shall be functional. APPLICABILITY: At all times. ACTION: a. With one or more of the above required penetration fire barriers non-functional, establish a continuous fire watch on at least one side of the affected penetration within one hour..."

Contrary to the above, on July 16 - 17, 1981, an electrical conduit penetration fire barrier in the common wall between the AE and DF Emergency Switchgear Rooms was only partially plugged with fire retardent material. No fire watch was posted. Each of the rooms comprises a separate fire protection zone and each contains one train of safety related electrical equipment.

This is a Severity Level IV violation (Supplement I).

Technical Specification 6.5.1.8 states "The OSC shall maintain written minutes of each meeting and copies shall be provided to the General Superintendent of Power Stations and Chairman of the Offsite Review Committee."

Beaver Valley Power Station Administrative Procedure, Chapter 10, Onsite Safety Committee (OSC), Revision 1, September 26, 1980; Step VI.A.2 states, "Minutes shall be recorded for all meetings, and all significant Committee actions shall be documented; minutes should be distributed to Committee members for review within one month of the meeting".

Contrary to the above, the following Committee actions were not documented in OSC meeting minutes generated during 1980:

- Fourteen instances in which the quorum requirements at meetings were not clearly documented.
- One instance in which a procedure review was not documented.
- Review of sixteen out of 200 temporary procedure changes were not documented.
- Investigations of violations identified in three inspection reports were not documented.
- Many instances in which meeting minutes were not distributed for review within one month.

This is a Severity Level VI Violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Duquesne Light Company is hereby required to submit to this office within thirty days of the date of this Notice, a written statement of explanation in reply, including: (1) corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

SEP 14 1981

Dated \_\_\_\_\_

*Original signed by*  
*R. R. Keating*  
R. R. Keating, Chief  
Projects Branch No. 2  
Division of Resident and Project  
Inspection

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