



Duquesne Light

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Pittsburgh, Pa.
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November 6, 1981

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Attn: R. C. Haynes, Regional Director
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 No. 81-22

Gentlemen:

In response to your letter of October 8, 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
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

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COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF BEAVER)

On this 19th day of November, 1981, before me, Sheila M. Fattore, a Notary Public in and for said Commonwealth and County, personally appeared J. J. Carey, who being duly sworn, deposed, and said that (1) he is Vice President of Duquesne Light, (2) he is duly authorized to execute and file the foregoing Submittal on behalf of said Company, and (3) the statements set forth in the Submittal are true and correct to the best of his knowledge, information and belief.

Sheila M. Fattore

SHEILA M. FATTORE, NOTARY PUBLIC
SHIPPINGPORT BORO, BEAVER COUNTY
MY COMMISSION EXPIRES SEPT. 26, 1985
Member, Pennsylvania Association of Notaries

DUQUESNE LIGHT COMPANY
Beaver Valley Power Station
Unit No. 1

Reply to Notice of Violation
Inspection No. 81-22
Letter dated October 8, 1981

VIOLATION (Severity Level VI; Supplement I)

Description of Violation (81-22-02)

Section 5.5.1 of the Environmental Technical Specification requires detailed written procedures for all activities involving releases to the environment, including sampling. Procedure RM 6.6 requires that for waste gas decay tank releases the waste gas decay tank pressure be obtained from the pressure transducer output in the control room.

Contrary to the above, as of August 26, 1981, the pre-release activity for waste gas had been calculated by using the pressure indicated on Bourdon gauge DI-GW-105A upstream of the sample bomb and not from the control room as required. The Bourdon gauge DI-GW-105A read systematically low by 3 psig; this error resulted in underestimating the pre-release calculations.

Discussion of Violation

The Shift Radiation Technician involved acknowledged he had been using the DI-GW-105A pressure gauge (local indication) instead of the Control Room pressure indication to calculate waste gas tank pre-release activity in violation of the procedure. However, the inspection report states that the Bourdon gauge read lower than the Control Room indication and resulted in underestimating pre-release calculations. Actually, the data on the Radioactive Waste Discharge Authorization Permits overestimated the actual release since the Bourdon gauge read higher than the Control Room indicator.

Although the wrong pressure indicator was utilized to calculate the pre-release data, it was noted during the inspection that even if the pre-release activity was underestimated, the conservatism in our method for determining pre-release decay tank specific activity and release rate limits precluded exceeding Environmental Technical Specification limits.

Corrective Action Taken

The Shift Radiation Technician involved was immediately notified to review and follow the requirements of Procedure RM 6.6.

Action Taken to Prevent Recurrence

All Shift Radiation Technicians were instructed to review the applicable section of Procedure RM 6.6. The required review is documented on a training roster.

Beaver Valley Power Station, Unit No. 1
Reply to Notice of Violation
Inspection No. 81-22
Page 2

Date On Which Full Compliance Will Be Achieved

Full compliance was achieved on August 26, 1981.

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