



Duquesne Light

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February 26, 1982

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Attn: Richard W. Starostecki, Director
Division of Resident and Project Inspection
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. 81-31

Gentlemen:

In response to your letter of January 29, 1982, 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.

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 1 day of March, 1982, before me, Heidi Martin, 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.

Heidi Martin

HEIDI MARTIN, NOTARY PUBLIC
CHIPPESWA TOWNSHIP, BEAVER COUNTY
MY COMMISSION EXPIRES JUNE 10, 1983
Member, Pennsylvania Association of Notaries

DUQUESNE LIGHT COMPANY
Beaver Valley Power Station
Unit No. 1

Reply to Notice of Violation
Inspection 81-31
Letter dated January 29, 1982

VIOLATION (Severity Level V; Supplement I)

Description of Violation (81-31-04)

Technical Specification 6.8.1.a requires implementation of written procedures as recommended in Appendix A of Regulatory Guide 1.33, November 1972. Regulatory Guide 1.33, Appendix A, Item E, recommends procedures for Correcting Abnormal, Off-normal, or Alarm Conditions. The BVPS Operating Manual, Section 1.11.4.K, Correcting Safety Related Alarm Conditions - Boron Injection Surge Tank Level Low, Issue 2, Revision 7, requires chemical sampling prior to adding makeup water after a low level alarm.

Contrary to the above, on November 24, 1981, no sample was taken prior to adding makeup water after a surge tank low level alarm.

Corrective Action Taken

Our review of the situation indicated that the Operating Manual was not clear as to when the sample, used for determining the makeup water addition, should be taken.

As noted in the report, samples were taken after the addition to assure that boron concentrations were within technical specification limits.

Action Taken to Prevent Recurrence

The Operating Manual (OM 1.11.4.K) was revised to clarify the steps required prior to adding makeup water after a surge tank low level alarm.

Additionally, a technical specification change is being sought to change the one hour time restraint for bringing the boron concentration in the Boron Injection Tank within limits since one hour doesn't allow sufficient time for all the necessary activities to be performed. These activities are sampling, analyzing, makeup concentration, recirculation to achieve uniform mixing, resampling and analyzing the new sample.

Date On Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.