

APPENDIX A

Notice of Violation

Duquesne Light Company
Beaver Valley Power Station

Docket Nos. 50-334 and 50-412
License Nos. DPR-66 and NPF-73

As a result of the inspection conducted on July 28 - September 7, 1990, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, (Enforcement Policy) (1989), the following violations were identified:

- A. Technical Specification 6.8.1.c requires that written procedures be established, implemented and maintained covering surveillance and test activities of safety related equipment.

Unit 2 Operating Surveillance Test 2.1.11D, Safeguards Protection System Train A CIA Go Test, steps 3.o and 3.p, requires that the Containment Instrument Air System be returned to service following testing of relay K605A.

Contrary to the above, test procedures were not implemented in that, on September 2, 1990, the Containment Instrument Air System was not returned to service as required. This led to an isolation of the Chemical and Volume Control System normal letdown line, an Engineered Safety Feature Actuation.

This is a Severity IV Violation (Supplement I) applicable to only Unit 2.

- B. Technical Specification 6.5.1.6.d requires the Onsite Safety Committee to review all proposed changes or modifications to plant systems or equipment that affect nuclear safety.

Contrary to the above, the Onsite Safety Committee did not review a proposed change to a Unit 1 system. On August 2, 1990, a 50 ampere rated input breaker to the No. 2 Battery Charger was replaced with a 40 ampere rated breaker and energized without the required prior Onsite Safety Committee review. The No. 2 Battery Charger is equipment that affects nuclear safety.

This is a Severity IV Violation (Supplement I) applicable to only Unit 1.

Pursuant to the provisions of 10 CFR 2.201, Duquesne Light Company is required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) admission or denial of the violations, (2) the reasons for the violations, if admitted, (3) corrective steps which have been taken and the results achieved, (4) corrective steps which will be taken to avoid further violations, and (5) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

EXECUTIVE SUMMARY FOR
INSPECTION REPORT 50-334/90-18 AND 50-412/90-18

Plant Operations One violation was identified concerning the failure to follow a surveillance test procedure which resulted in an Engineered Safety Feature actuation. The inspector also reviewed several other events and determined the events were of minor safety significance. Housekeeping at both units was good.

Radiological Protection Routine review of the area identified no noteworthy observations.

Surveillance and Maintenance The inspector reviewed the licensee's Site Management Facility Walkdown program. The program was determined to be fully implemented and effective, and constituted a notable strength. One violation was identified for failure to follow a procedure during a test of a Safeguards Protection System.

Emergency Preparedness The inspector monitored licensee activities associated with the Alert which was declared for Unit 2 on August 30, 1990. The licensee promptly determined that a carbon dioxide discharge that occurred during system testing required an evaluation with respect to the emergency action levels of the Emergency Preparedness Plan. Upon declaration of the Alert, the licensee completed all required notifications in a timely manner. On-site groups were mobilized in accordance with the Plan. The licensee consulted with, and obtained the agreement of, all offsite groups prior to Alert termination. The inspectors concluded that the event had little safety significance and licensee actions were found to be timely and conservative throughout the event.

Security Routine review of this area identified no noteworthy observations.

Engineering and Technical Support One unresolved item was identified with respect to a potential design deficiency in the closure logic of the containment isolation dampers.

Safety Assessment/Quality Verification One violation was identified concerning the failure of the Onsite Safety Committee to review a Unit 1 modification to the No. 2 Battery Charger prior to installation. Licensee activities in response to a Unit 1 Auxiliary Feedwater (AFW) pressure switch problem were reviewed. The inspector found the licensee's actions to be generally good, especially the conservatism exhibited in the operators' decision to declare AFW not operable in the absence of information. Licensee followup actions were not as strong, but no safety significant problems were identified.

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