

Duquesne Light Company

Beaver Valley Power Station
P.O. Box 4
Shippingport, PA 15077-0004

JOHN D. SIEBER
Senior Vice President and
Chief Nuclear Officer
Nuclear Power Division

February 24, 1994

(412) 393-5255
Fax (412) 643-8069

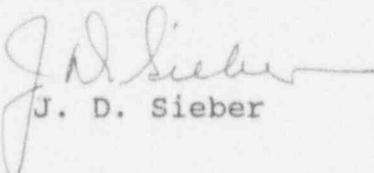
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

**Subject: Beaver Valley Power Station, Unit No. 2
Docket No. 50-412, License No. NPF-73
Combined Inspection Report 50-334/93-28 and 50-412/93-30
Reply to Notice of Violation**

In response to NRC correspondence dated January 25, 1994, and in accordance with 10 CFR 2.201, the attached reply addresses the Notice of Violation transmitted with the subject inspection report.

If there are any questions concerning this response, please contact Mr. L. R. Freeland at (412) 393-5101.

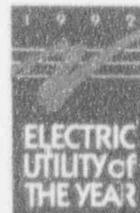
Sincerely,


J. D. Sieber

Attachment

cc: Mr. L. W. Rossbach, Sr. Resident Inspector
Mr. T. T. Martin, NRC Region I Administrator
Mr. G. E. Edison, Project Manager
Mr. J. C. Linville, Chief, Projects Branch No. 3, Region I

070085
9403090185 940224
PDR ADDCK 05000334
PDR



JE01

DUQUESNE LIGHT COMPANY
Nuclear Power Division
Beaver Valley Power Station, Unit No. 2

Reply to Notice of Violation

Combined Inspection Report 50-334/93-28 and 50-412/93-30
Letter dated January 25, 1994

VIOLATION (Severity Level IV; Supplement I)

Description of Violation (50-412/93-30-01)

With the plant in Mode 1, Technical Specifications 3.6.1.1 and 3.6.3.1 require that containment isolation valves 2PAS*SOV105A2 and 2CVS*SOV102 be capable of automatic closure, or the affected penetrations must be: (1) restored to operable status within 4 hours; or (2) isolated within 4 hours by the use of at least one deactivated automatic valve secured in the isolation position; or (3) isolated within 6 hours by use of at least one closed manual valve or blind flange.

Contrary to the above, with the plant in Mode 1, on December 9, 1993, the phase-A containment isolation signal was inadvertently defeated for valves 2PAS*SOV105A2 and 2CVS*SOV102, rendering the valves not capable of automatic closure, and the affected penetrations were neither: (1) restored to operable status within 4 hours; nor (2) isolated within 4 hours by the use of at least one deactivated automatic valve secured in the isolation position; or (3) isolated within 6 hours by use of at least one closed manual valve or blind flange.

Description of Event

On December 9, 1993, an inside containment isolation valve failed to close during a surveillance test. The action required by the Technical Specification was taken by de-energizing shut the associated outside containment isolation valve (2SSR*SOV129A2). The breaker which was opened to de-energize the valve also de-energized four auxiliary relays which provide a phase-A containment isolation (CIA) signal to two other containment isolation valves. The affected valves were 2PAS*SOV105A2 (containment atmosphere sample line outside containment isolation valve) and 2CVS*SOV102 (containment air activity monitor pump discharge outside containment isolation valve).

Reason For the Violation

The cause of this event was inadequate implementation of corrective actions for a previous event (LER 92-011-00) which occurred on September 8, 1992. The corrective actions performed for that event included a revision to the 125VDC System Breaker Load Lists to identify the circuit interconnections, and placing a caution tag on breaker 8-27 on Panel DC2-10 to alert personnel of the Containment Isolation Phase A (CIA) signal interactions.

Reason for Violation, Continued

The breaker load lists were revised to reflect the system interconnections. However, the caution tag was inappropriately removed on September 20, 1993, by operations supervisory personnel following a review of the breaker load lists to ensure the required revision was performed. The use of a permanent caution tag had been intended, but this was not specifically stated in the corrective actions and as a result, was not utilized. On December 9, 1993, the control room staff did not refer to the breaker load list when de-energizing breaker 8-27 on Panel DC2-10, and caution tags were not present to warn operators of the unique circuit interaction with CIA functions.

Corrective Action Taken

1. Following the discovery of the problem, a temporary modification was performed to allow Operations to maintain valve 2SSR*SOV129A2 de-energized with breaker 8-27 on Panel DC2-10 closed. The phase A containment isolation signal (CIA) for valves 2PAS*SOV105A2 and 2CVS*SOV102 was then re-enabled with the closure of breaker 8-27 on Panel DC2-10.
2. Temporary caution tags were immediately placed on breaker 8-27 on Panel DC2-10 for valve 2SSR*SOV129A2 and breaker 8-20 on Panel DC2-03 for valve 2SSR*SOV129A1 (the opposite train valve). These tags alerted personnel that opening these breakers would deactivate the CIA closure signals to other valves.
3. This event was reported to the NRC via Licensee Event Report 93-016-00.

Action Taken to Prevent Recurrence

1. The temporary caution tags were removed and replaced with permanent caution tags on breaker 8-27 on Panel DC2-10 and breaker 8-20 on Panel DC2-03.
2. This event will be discussed in Module 2 of Licensed Retraining to alert Operations Department personnel of the potential for this type of event and the importance of using multiple barriers to prevent future occurrences.
3. The Independent Safety Evaluation Group (ISEG) will perform a review of the Beaver Valley Unit 2 containment isolation valve circuits that perform a phase A (CIA) or phase B (CIB) containment isolation function. This independent review will determine the need for any additional caution tags and/or updates to the breaker load lists as a result of a breaker controlling multiple loads.

Reply to Notice of Violation

Combined Inspection Report 50-334/93-28 and 50-412/93-30

Page 3

Date When Full Compliance Will Be Achieved

We are in full compliance at this time.

Module 2 of Licensed Retraining will be completed by April 1, 1994.

The ISEG review will be completed by June 1, 1994.