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MAR 15 1994

Docket Nos. 50-334  
50-412

Mr. J. D. Sieber  
Senior Vice President  
Nuclear Power Division  
Duquesne Light Company  
Post Office Box 4  
Shippingport, Pennsylvania 15077

Dear Mr. Sieber:

SUBJECT: COMBINED INSPECTION 50-334/93-28 AND 50-412/93-30

This letter refers to your February 24, 1994 correspondence, in response to our January 25, 1994 letter.

Thank you for informing us of the corrective and preventive actions documented in your letter regarding your inadvertent defeating of the automatic isolation signal to two containment isolation valves. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:  
James C. Linville

James C. Linville, Chief  
Projects Branch No. 3  
Division of Reactor Projects

cc:

- G. S. Thomas, Vice President, Nuclear Services
- D. E. Spoerry, Vice President, Nuclear Operations
- L. R. Freeland, General Manager, Nuclear Operations Unit
- K. D. Grada, Manager, Quality Services Unit
- N. R. Tonet, Manager, Nuclear Safety Department
- H. R. Caldwell, General Superintendent, Nuclear Operations

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Mr. J. D. Sieber

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cc w/cy of Licensee's Response Letter:  
K. Abraham, PAO (2 copies)  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
NRC Resident Inspector  
Commonwealth of Pennsylvania  
State of Ohio

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Mr. J. D. Sieber

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MAR 15 1994

bcc w/encls:

Region I Docket Room (with concurrences)

W. Lazarus, DRP

D. Lew, DRP

M. Oprendeck, DRP

W. Butler, NRR

G. Edison, NRR

V. McCree, OEDO

M. Shannon, ILPB

RI:DRP

WLazarus/meo

3/14/94

RI:DRP

JJinville

3/15/94

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# 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

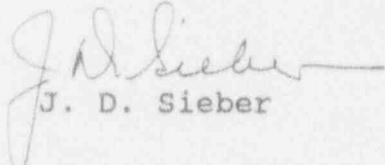
U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

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) 393-5211.

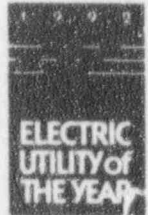
Sincerely,

  
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

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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  
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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.