

DEC 06 1990

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Docket Nos. 50-334
50-412

License Nos. DPR-66
NPF-73

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

Gentlemen:

Subject: Combined Inspection Nos. 50-334-90-18 and 50-412-90-18

This refers to your letter dated November 1, 1990, which responded to Combined Inspection Nos. 50-334/90-18 and 50-412/90-18, Appendix A, "Notice of Violation."

Thank you for informing us of your corrective and preventive actions documented in your letter. These actions are subject to examination during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By

Don Haverkamp for

Edward C. Wenzinger, Chief
Projects Branch No. 4
Division of Reactor Projects

cc:

J. J. Carey, Executive Vice President, Operations
W. S. Lacey, General Manager, Corporate Nuclear Operations
D. E. Sperry, General Manager, Nuclear Operations Services
K. E. Halliday, Manager, Nuclear Engineering
N. R. Tonet, Manager, Nuclear Safety
T. P. Noonan, General Manager, Nuclear Operations
S. C. Fenner, Manager, Quality Services
K. D. Grada, Manager, Technical Assistant, Vice President, Nuclear Group
H. R. Caldwell, General Superintendent, Nuclear Operations
K. Abraham, PAO (17) SALP Reports and (2) All Inspection Reports
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
Commonwealth of Pennsylvania

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bcc:
Region I Docket Room (with concurrences)
Management Assistant, DRMA (w/o encl)
R. Bores, DRSS
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J. Stewart, DRP
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P. Tam, NRR

RI:DRP
Harris/gc
12/4/90

RI:DRP
Ruland
12/4/90

RI:DRP
Wenzinger
12/5/90

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Duquesne Light Company

Beaver Valley Power Station
PO Box 4
Shippingport, PA 15077-0004

JOHN D. SIEBER
Vice President - Nuclear Group

November 1, 1990

412-304-2255

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

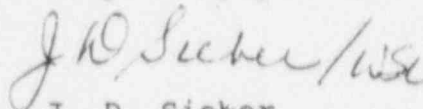
Reference: Beaver Valley Power Station, Unit No. 1 and No. 2
BV-1 Docket No. 50-334, License No. DPR-66
BV-2 Docket No. 50-412, License No. NPF-73
Combined Inspection Report 50-334/90-18 and 50-412/90-18

Gentlemen:

In response to NRC correspondence dated October 3, 1990 and in accordance with 10 CFR 2.201, the attached reply addresses the Notice of Violation included with the referenced inspection report.

If there are any questions concerning this response, please contact my office.

Very truly yours,



J. D. Sieber
Vice President
Nuclear Group

Attachment

cc: Mr. J. Beall, Sr. Resident Inspector
Mr. T. T. Martin, NRC Region I Administrator
Mr. Edward C. Wenzinger, Chief Reactor Projects Branch No. 4,
Division of Reactor Projects, Region I
Mr. A. W. DeAgazio, Project Manager
Mr. R. Saunde (VEPCO)

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DUQUESNE LIGHT COMPANY
NUCLEAR GROUP
BEAVER VALLEY POWER STATION UNITS 1 AND 2

Reply to Notice of Violation
Combined NRC Inspection 50-334/90-18 and 50-412/90-18
Letter dated October 3, 1990

Violation A (Severity Level IV, Supplement I)

Description of Violation (50-412/90-18-01)

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.

Admission or Denial of Alleged Violation

Duquesne Light Company (DLC) admits the violation occurred as stated.

Reasons for the Violation

This violation occurred because the operating crew deviated from the surveillance procedure to protect plant equipment (air compressor) from unnecessary cycling. The station's administrative procedures allow both on-the-spot revisions of procedures or performance of partial surveillance tests. Either of these methods would have provided an approved method of modifying the test.

The operating crew supervisor failed to follow either of these processes and only issued verbal instructions to the operator to deviate from the procedure. The operator performing the test made the manipulations per his verbal instructions and inadvertently allowed the containment instrument air isolation valve to remain closed for an extended period of time, which resulted in the isolation of normal letdown.

Corrective Actions Taken

- 1) The reactor coolant letdown flow path and containment instrument air flow path were returned to their normal system arrangement in accordance with procedures.
- 2) The involved operators have been counseled concerning this event. This counseling stressed the requirements for procedural compliance along with the basis and methods for changing procedures.
- 3) LER 90-009 was issued for Beaver Valley Unit 2.

Action Taken to Prevent Recurrence

- 1) This event will be reviewed with all operators in Module 1 of the 1990/91 cycle of licensed and non-licensed retraining.
- 2) Operating Surveillance Test 2.1.11D has been revised to alert the operators that while IAC*MOV130 is closed, all air to containment is isolated.
- 3) The station has conducted an INPO Human Performance Enhancement System (HPES) evaluation of this event. The results of this evaluation have been reviewed and incorporated in the above corrective actions.

Date When Corrective Action Will Be Complete

Module 1 of the operator retraining will be completed by January 31, 1991.

Violation B (Severity Level IV, Supplement I)

Description of Violation (50-334/90-18-01)

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.

Admission or Denial of Alleged Violation

Duquesne Light Company (DLC) admits the violation occurred as stated.

Reasons for the Violation

The violation was due to the misuse of one of the existing configuration control processes (the Technical Evaluation Report) at Beaver Valley.

Corrective Action

The review of the battery charger breaker change was performed by the OSC. There were no safety implications as a result of this event.

Action Taken to Prevent Recurrence

A review of the OSC Administrative procedure and associated 10 CFR 50.59 training was conducted and found in agreement to the requirements stated in the violation. It is determined the violation was due to misuse of an existing configuration control process, the Technical evaluation Report (TER). The two other configuration

management procedures, design change process and temporary modification procedure, presently require OSC review and a 10 CFR 50.59 safety evaluation in all situations involving a change to the UFSAR. The TER procedure will be improved to provide the same controls. Presently, the TER process does evaluate for changes needed to the UFSAR. This evaluation process will be upgraded to require OSC review before the design modification is approved.

This concept will also be incorporated into the procedures for the 'minor modifications' program, which is expected to be implemented in 1991.

Date When Corrective Action will be Complete

The TER procedure (NEAP 2.13) will be revised by November 30, 1990.