

APPENDIX A

NOTICE OF VIOLATION

Duquesne Light Company
Beaver Valley Power Station, Unit 1

Docket No. 50-334
License No. DPR-66

As a result of the inspection conducted on August 17 - September 27, 1982, and in accordance with the NRC Enforcement Policy, 10 CFR 2 Appendix C, 47 FR 9987 (March 9, 1982), the following violations were identified:

- A. Technical Specification 6.8 and Appendix A of Regulatory Guide 1.33, November, 1972 require the implementation of procedures to control system operation and surveillance and test activities of safety related equipment. The BVPS OM Chapter 1.48.3, Section G, Adherence to Operating Procedures, Revision 22, requires activities affecting the nuclear safety of the plant be conducted in accordance with procedures developed for such activities and, in the event a procedure cannot be followed as written, the evolution should not be conducted unless required by an emergency situation, or the procedure has been revised, or a decision has been made by the Station Superintendent that a revised procedure is not necessary.

Contrary to the above:

1. OST 1.11.9, Accumulator Isolation Valve Breaker Alignment Verification, Revision 5, was performed on September 9, 1982 with the pressurizer pressure less than the minimum 2,000 psig specified in the initial conditions. No Operating Manual Change Notice had been submitted or approved to change this initial condition.
2. Loop Calibration Procedure 24-L498, Steam Generator 1C Water Level Control Loop Calibration, Revision 4, was used to trouble shoot the 1C level control system on September 24, 1982 without meeting the specified initial conditions.

This is a Severity Level V violation (Supplement I).

- B. The BVPS Quality Assurance Program (Appendix A to the FSAR), Section A.2.2.14, Inspection, Test and Operating Status; ANSI N18.7-1972, Administrative Controls for Nuclear Power Plants; and QA Procedure OP-9, Technical Procedure Control for Operations and Maintenance, Revision 4, require the establishment of procedures for equipment control to maintain reactor and personnel safety and to avoid unauthorized operation of equipment. The BVPS OM Chapter 1.48.6, Section B, Mechanical and Electrical Clearance Procedures, Revision 19, requires the Reactor Operator or Plant Operator to update the Control Room prints and Status Boards when performing all clearance related valving and switching.

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Contrary to the above, the Control Room prints and Status Boards were not updated to reflect the operating status resulting from the following Equipment Clearances:

1. No. 479543, Changing Filter 4B, posted June 23, 1982.
2. No. 480017, Reactor Plant River Water Pump 1A Vacuum Breaker, posted September 9, 1982.
3. No. 480032, Diesel Generator No. 2 Cooling System Heat Exchanger B, posted September 20, 1982.

This is a Severity Level V violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Duquesne Light Company is hereby required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including:

- (1) the corrective steps which have been taken and the results achieved;
- (2) corrective steps which will be taken to avoid further violations; and
- (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending your response time.