

## ENCLOSURE 1

### NOTICE OF VIOLATION

Duquesne Light Company  
Beaver Valley Power Station, Unit 2

Docket No. 50-412  
License No. NPF-73

During an NRC inspection conducted between April 19 and May 23, 1994, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1992), the violations are listed below:

1. 10 CFR 50, Appendix B, Criterion III (Design Control) requires, in part, that measures be established to assure that applicable regulatory requirements and design bases for those structures, systems, and components to which the appendix applies are correctly translated into specifications, drawings and instructions. Table 8.1-1 of the Unit 2 Updated Final Safety Analysis Report lists NRC Branch Technical Position (BTP) ICSB 18 as a design basis document applicable to onsite Class-1E AC power systems. NRC BTP ICSB 18 specifies protection from single active failure for safety systems.

Contrary to the above, the licensee failed to completely incorporate NRC BTP ICSB 18 into Design Change Package 2040. This design change removed the high head safety injection alternate minimum flow system from service leaving the charging pump vulnerable to a single active failure of the minimum flow discharge header isolation valve 2CHS-MOV373.

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

2. Beaver Valley Unit 2 Technical Specification Table 3.3-1, "Reactor Trip System Instrumentation," Action 2.b.1, requires that with the number of operable power range channels one less than the total number of channels and with the thermal power level above 5 percent, operation may continue provided the inoperable channel is placed in a tripped condition within 1 hour.

Contrary to the above, on April 12, 1994, power range neutron monitor channel N-42 was placed in an inoperable condition during the calibration of the delta-flux circuitry; and, while operating at full power, the reactor trip function for high neutron flux was not placed in a tripped condition within 1 hour.

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

Pursuant to the provisions of 10 CFR 2.201, Duquesne Light Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the facility that is the

subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken to avoid further violations; and, (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at King of Prussia, Pennsylvania

this 27th day of June, 1994

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