## ENCLOSURE 1

## NOTICE OF VIOLATION

Duquesne Light Company
Beaver Valley Power Station, Unit 2

Docket Nos. 50-412
License Nos. NPF-73

During an NRC inspection conducted between June 28 to August 1, 1994, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

> 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. Section 7.8 of the Duquesne Light Company Nuclear Power Division Administrative Manual (NPDAP), "Station Modification Control," defines the requirements and responsibilities for physical or functional changes to Beaver Valley Power Station structures, systems and components.
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> Contrary to the above, in April 1991, the Duquesne Light Company isolated service water flow from the Unit 2 rod control/cable vault area room coolers without appropriate design control measures, and without following appropriate design control procedures. Specifically:
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> (1) The calculation used to justify removal of service water from the rod control/cable vault room coolers, performed in late 1990, used superseded design information. The calculation justified removal of service water from the coolers by taking credit for the cooling effect of air flow from the supplemental leak collection and release system (SLCRS). The SLCRS air balance was changed in 1988 to reduce the differential pressure across the doors to the containment contiguous areas. The rod control/cable vault areas were left with a total minimum air flow rate of 1110 cubic feet per minute (cfm). The pre-1988 minimum air flow rate was 15,000 cfm. The calculation used the 15,000 cfm rate vice the 1110 cfm rate. If the 1110 cfm rate had been used in the calculation, it would not have supported removal of service water flow from the coolers.
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> (2) Service water was isolated from the rod control/cable vault room coolers, negating their cooling function following a loss of offsite power, without submitting a Station Modification Request, as required by NPDAP Section 7.8. Since a Station Modification Request was not initiated, the design change was implemented without appropriate review and approval, and several baseline configuration documents were not updated to reflect the change. The documents which were not updated included:

the service water system design basis document (DBD-30), the service water system flow diagrams, Chapter 30 of the Operating Manual, and Sections 6.5.3.2, 9.2.1, 9.4.12, and Appendix 9.5A of the Updated Final Safety Analysis Report.

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 94-17-03**. 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 17th day of Aug., 1994