



Duquesne Light

Nuclear Division
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September 22, 1983

~~United States Nuclear Regulatory Commission~~
~~Office of Inspection and Enforcement~~
Attn: Mr. Richard W. Starostecki, Director
Division of Project and Resident Programs
Region 1
631 Park Avenue
King of Prussia, PA 19406

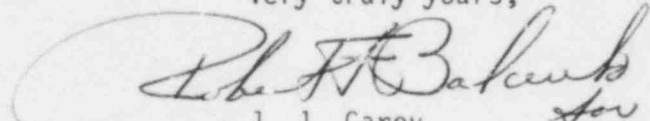
Reference: Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66
IE Inspection Report No. 83-14

Gentlemen:

In response to your letter of August 23, 1983, and in accordance with 10CFR2.201, the attached reply addresses the Notice of Violation which was included as Appendix A with the referenced Inspection Report.

If you have any question concerning this response, please contact my office.

Very truly yours,


J. J. Carey
Vice President, Nuclear

Attachment

cc: Mr. W. M. Troskoski, Resident Inspector
U. S. Nuclear Regulatory Commission
Beaver Valley Power Station
Shippingport, PA 15077

U. S. Nuclear Regulatory Commission
c/o Document Management Branch
Washington, DC 20555

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DUQUESNE LIGHT COMPANY
Beaver Valley Power Station
Unit No. 1

Reply to Notice of Violation
Inspection 83-14
Letter dated August 23, 1983

VIOLATION (Severity Level IV; Supplement I)

Description of Violation (83-14-01)

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. OM Chapter 1.48.6, Section 6, Clearance Procedures, requires that an Equipment Clearance Permit be established prior to removing plant equipment or systems from service.

Contrary to the above, the "A" Reactor Plant River Water System was removed from service on August 5, 1983, without the required equipment clearance, when the header expansion joint was mistakenly identified and pulled as part of the "B" header in-service inspection.

Discussion

As was noted in the inspection report, a unique design feature of the River Water System contributed to the violation. Although the 1A River Water Pump is located down-river of the 1B Pump (per normal station numbering practice) the "B" River Water Header exits the intake structure down-river of the "A" Header. Construction personnel were attempting to work on a River Water Header expansion joint which was not marked. Inadequate expansion joint identification, line identification and the unique design configuration were the major contributors to this error.

Corrective Action Taken

The Control Room was immediately notified and appropriate corrective actions were taken to clear the "A" Header and pump the water from the valve pit.

Action Taken to Prevent Recurrence

The subject River Water Header expansion joints have now been clearly tagged utilizing stainless steel binding type tags. The River Water Header expansion joints in other valve pits have also been tagged.

Licensing has issued an information package concerning this event to the Construction Department Nuclear for review by their Construction Specialists to ensure they are aware of the details of this incident.

Date on Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.