

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Beaver Valley Power Station	DOCKET NUMBER (2) 0 5 0 0 0 3 3 4	PAGE (3) 1 OF 02
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TITLE (4)  
Missed Surveillances

EVENT DATE (6)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES		
0	5	17	8	4	8	4	0	0	N/A		
8	4	8	4	0	0	5	0	0	N/A		
0	5	17	8	4	8	4	0	0	0 5 0 0 0		
8	4	8	4	0	0	5	0	0	0 5 0 0 0		

OPERATING MODE (9) 1

POWER LEVEL (10) 1 0 0

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 8: (Check one or more of the following) (11)

<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(e)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)
<input type="checkbox"/> 20.406(a)(1)(i)	<input type="checkbox"/> 50.38(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)
<input type="checkbox"/> 20.406(a)(1)(ii)	<input type="checkbox"/> 50.38(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	OTHER (Specify in abstract below and in Text, NRC Form 362A)
<input type="checkbox"/> 20.406(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	
<input type="checkbox"/> 20.406(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	
<input type="checkbox"/> 20.406(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME Robert J. Druga, Chief Engineer	TELEPHONE NUMBER 4 1 1 2 6 4 3 1 - 1 1 2 6 4
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS
D	X	X	X	X	X	X	X	X	N

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE)  NO

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

During a Quality Assurance Audit, two surveillance requirements were identified for which the surveillance procedures were inadequate. First, the closed verification for the containment vacuum break outside isolation damper was not included in the surveillance test for containment integrity penetration verification as required by Technical Specification 4.6.1.1.a.1. Second, the actuation switch for the manual transfer of safety injection to the recirculation mode had no surveillance procedure to verify its operability as required by Technical Specification 4.3.2.1.1, Table 4.3-2, Item 1.1.a. These missed surveillances are non-conservative with respect to Technical Specification 4.0.2 which states that failure to perform a surveillance requirement within the specified time interval constitutes a failure to meet the operability requirements for a limiting condition for operation. The surveillances of the damper and manual actuation switch will be included in the appropriate procedures. These missed surveillances were discovered during the development of a computer program that will review procedures which perform Technical Specification Surveillance requirements to ensure that each surveillance requirement is included in the appropriate procedure. This program will be used as a check against omissions upon its completion.

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PDR ADDCK 05000334  
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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)  Beaver Valley Power Station	DOCKET NUMBER (2)  0 5 0 0 0 3 3 4 8 4	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		- 0	0 5	- 0	0	0 2

TEXT (If more space is required, use additional NRC Form 388A's) (17)

As a result of a Quality Assurance Audit, it was discovered on 5/17/84 that two Technical Specification Surveillance Requirements existed for which the corresponding surveillance procedures were incomplete.

Surveillance requirement 4.6.1.1.a.1 states that all penetrations not capable of being closed by operable containment automatic isolation valves and required to be closed during accident conditions shall be verified to be closed by valves, blind flanges or deactivated automatic valves secured in their positions at least once per 31 days. The outside containment vacuum break isolation damper [VS-D-5-6] falls under this requirement, but was not included in the monthly containment integrity surveillance test. The verification that this damper is closed has been incorporated in the appropriate procedures. There were no safety implications associated with this omission. The inside containment isolation damper [VS-D-5-5B] had been verified de-energized shut and locked monthly and the outside containment damper [VS-D-5-6] had been verified shut and locked quarterly, via a padlock log.

Surveillance requirement 4.3.2.1.1, Table 4.3-2, Item 1.1.a states that manual actuation switches (for engineered safety features) shall be tested at least once per 18 months during shutdown. The manual actuation switch for the transfer of safety injection to recirculation mode falls under this requirement, but was not included in the procedure which tests the transfer. All future performances of this test will also test the manual actuation switch for operability. There were no safety implications associated with this omission. The automatic transfer of safety injection to recirculation mode was operable, and should it have failed, the manual actuation switch would have provided operator convenience only. The desired valve alignment could be attained from the control room, without the manual actuation switch, in a timely manner. These missed surveillances were discovered during the development of a computer program that will review procedures which perform technical specification surveillance requirements to ensure that each surveillance requirement is included in the appropriate procedure. This program will be used as a check against omissions upon its completion.



**Duquesne Light**

Nuclear Division  
P.O. Box 4  
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Telephone (412) 393-6000

June 14, 1984  
ND1SS1:3008

Beaver Valley Power Station, Unit No. 1  
Docket No. 50-334, License No. DPR-66  
LER 84-005

Dr. Thomas E. Murley  
Regional Administrator  
United States Nuclear Regulatory Commission  
Region 1  
Park Avenue  
King of Prussia, PA 19406

Gentlemen:

In accordance with Appendix A, Beaver Valley Technical Specification, the following Licensee Event Report is submitted:

LER 84-005, 10 CFR 50.73.a.2.i.b, "Failure To Comply With Surveillance Requirements".

Very truly yours,

Wm. S. Lacey  
Station Superintendent

Attachment

T. E. Murley  
June 14, 1984  
ND1SS1:3008  
Page three

cc: Director of Management & Program Analysis  
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Washington, D.C. 20555

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