Duquesne Light Company

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GEORGE S. THOMAS Division Vice President Nuclear Services Nuclear Power Division

October 23, 1995

U. S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, DC 20555-0001

Subject:

Beaver Valley Power Station, Unit No. 2

BV-2 Docket No. 50-412, License No. NPF-73

Integrated Inspection Report 50-334/95-13 and 50-412/95-13

Reply to Notice of Violation

In response to NRC correspondence dated September 22, 1995, and in accordance with 10 CFR 2.201, the attached reply addresses the Notice of Violation transmitted with the subject inspection report.

If there are any questions concerning this response, please contact Mr. Roy K. Brosi at (412) 393-5210.

Sincerely,

George S. Thomas

c: Mr. L. W. Rossbach, Sr. Resident Inspector

Mr. T. T. Martin, NRC Region I Administrator

Mr. D. S. Brinkman, Sr. Project Manager

Mr. P. W. Eselgroth, Chief, Projects Branch No. 7

Division of Reactor Projects, Region I

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DUQUESNE LIGHT COMPANY Nuclear Power Division Beaver Valley Power Station Unit No. 2

Reply to Notice of Violation

Integrated Inspection Report 50-334/95-13 and 50-412/95-13 Letter Dated September 22, 1995

VIOLATION (Severity Level IV, Supplement I)

Description of Violation (50-412/95-13-01)

Technical Specification 3.5.4 requires that reactor coolant pump seal injection flow shall be less than or equal to 28 gpm with the charging pump discharge pressure greater than or equal to 2410 psig and the seal injection flow control valve full open. With the seal injection flow not within the limit, adjust manual seal injection throttle valves to give a flow within the limit with the charging pump discharge pressure greater than or equal to 2410 psig and the seal injection flow control valve full open within 4 hours or be in at least HOT STANDBY within the next 6 hours.

Contrary to the above, between March 22 and March 23, and between July 23 and July 25, 1995, reactor coolant pump seal injection flow exceeded 28 gpm and was not restored within limits within 4 hours.

Reason For The Violation

The reason for the violation was a failure of the operator to follow operating procedure 20M-7.4A, "Placing a Charging Pump in Standby or Inservice" through to completion.

Corrective Action Taken

Procedure 20M-7.4A has been revised (effective 10-5-95) to add requirements to initial and date each action step in the procedure and to perform a document review with a signature at the completion of the procedure. This will ensure completion of the step that measures total seal injection flow.

Action Taken to Prevent Recurrence

The equivalent procedure at Beaver Valley Unit 1 (BV-1) already contains a document review with a signature requirement. A review of the BV-1 operating logs was performed. No similar occurrences of missed surveillances of the reactor coolant pump seal injection flow after charging pump transfer were identified. Based on the results of this review it is felt that the BV-2 procedure revision will prevent recurrence. However, to further reinforce procedure compliance, licensed Unit 2 Operations personnel will review this event in conjunction with the requirements governing procedure usage.

Date When Full Compliance Will Be Achieved

We are in full compliance at this time. The review of this event and procedure usage requirements will be completed by November 23, 1995.