

APPENDIX A

NOTICE OF VIOLATION

Duquesne Light Company
Beaver Valley Unit 1

Docket No. 50-334
License No. DPR-66

As a result of the inspection conducted on June 2 - July 6, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C) published in the Federal Register on March 8, 1984 (47 FR 8583), the following violations were identified:

- A. Technical Specification 6.8.1 and Appendix A of Regulatory Guide 1.33, November, 1972, require the establishment and implementation of procedures covering equipment control. Station Administrative Procedures, Chapter 4, Operations and Operating Manual Chapter 1.48.6, Clearance Procedures, require the use of an Equipment Clearance Permit and Switching Order, as authorized by the Nuclear Shift Supervisor to provide control measures for identifying the clearance boundary points and scope of planned maintenance activities. Once issued, no changes, additions or deletions to a Clearance Permit are allowed and no work is permitted on adjoining components or apparatus. Additionally, Control Room prints, Control Boards and Status Boards are required to be updated as the Switching Order is carried out, to assure that they accurately reflect plant conditions.

Contrary to the above:

1. The scope of work planned for River Water Pump 1C Motor Breakers, under Equipment Clearance Permit 495226, was expanded to adjoining apparatus to include a motor lube oil changeout on June 20, 1984, without obtaining a new Clearance Permit; and,
2. Control Room prints, Control Boards and Status Boards were not updated to reflect the electrical clearance.

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

- B. 10 CFR 50, Appendix B, Criteria XI, and the BVPS Unit 1 Updated FSAR, Appendix A, Operations Quality Assurance Program, Section A.2.2.11, Test Control, require that written test procedures used to demonstrate the operability of systems and components incorporate acceptance limits contained in applicable design documents. Technical Specification 4.8.2.3.2.d, requires that station batteries be subjected to a battery service test to demonstrate the capacity is adequate to supply and maintain all actual or simulated emergency loads for a two hour design duty cycle on an 18 month test frequency. IEEE Standard 450-1980, IEEE Recommended Practice for Maintenance Testing and Replacement of Large Lead Storage Batteries for Generating Stations and Substations, referenced in the Technical Specification bases, states that the discharge rate and test duration should correspond as closely as practical to the design requirements (battery duty cycle) of the DC system.

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Contrary to the above, BVT 1.1 - 1.39.1(2), No. 1(2) Battery and Charger Load Test, used to perform the 18 month service test on station batteries No. 1 and No. 2, did not incorporate acceptance criteria corresponding to the design requirements of the DC system. Specifically, since initial acceptance testing conducted in 1976, a flat discharge rate of 90 amps for two hours has been used as the battery service test without relating it to the duty cycle expected during a design bases accident.

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 to this office within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the corrective steps which have been taken and the results achieved; (2) the corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

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