

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Beaver Valley Power Station, Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 3 3 4	PAGE (3) 1 OF 0 2
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TITLE (4)
Missed Operations Surveillance Test Required By Technical Specifications

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES		
0	7	0 6	8	4	8 4	0	0	9	N/A		
0	7	0 6	8	4	8 4	0	0	8	N/A		

OPERATING MODE (9) 5

POWER LEVEL (10) 0 0 0

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

20.402(b)	20.406(e)	50.73(a)(2)(iv)	73.71(b)
20.406(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(e)
20.406(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
20.406(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
20.406(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
20.406(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12)

NAME Robert J. Druga, Chief Engineer	TELEPHONE NUMBER 4 1 2 6 4 3 - 1 2 6 4
AREA CODE	

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	I	C	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)

On 3/22/84, with the plant operating at 100 percent power, OST 1.33.16 (Smoke Detection Instrumentation Test) was performed as per the procedure. The procedure states that the containment smoke detectors are to be tested only with the station shutdown and containment at atmospheric conditions. Therefore, the containment smoke detectors were not checked at that time. A forced outage occurred on 7/04/84 in which the plant was placed in Mode 5 (Cold Shutdown). During the preparation for the subsequent startup on 7/06/84, a review of the OST's necessary to leave Mode 5 was performed. This review showed OST 1.33.16 to be only partially complete, since the containment smoke detectors had not been tested. A conflict between technical specifications and OST 1.33.16 was noted at this time. The technical specification pertaining to Fire Detection Instrumentation requires testing of all smoke detectors, including the ones in containment on a six month frequency, regardless of operating conditions. OST 1.33.16 was performed satisfactorily to verify the operability of the containment smoke detectors. A technical specification change is currently in preparation which will preclude incidents of this nature from occurring in the future.

This report is submitted at a time period longer than 30 days per 10 CFR 50.73 due to a misinterpretation of the reportability.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
Beaver Valley Power Station, Unit 1	0500033484	-009	-000	02	OF	02

TEXT (If more space is required, use additional NRC Form 366A's) (17)

During normal full power operation on 3/22/84, Operations Surveillance Test (OST) 1.33.16 (Smoke Detection Instrumentation Test) was performed as scheduled. This surveillance test was performed as per the procedure. However, only a partial surveillance test was conducted at that time since the procedure permitted exclusion of the containment smoke detectors if the unit was not shut down and containment was not at atmospheric conditions. All other smoke detectors outside containment were tested as required.

A forced outage occurred on 7/4/84. This outage entailed placing the plant into Mode 5 (Cold Shutdown) and entering containment in order to perform necessary maintenance on a defective valve. On 7/6/84, during a review of OST's required to leave Mode 5 in preparation for the subsequent startup, it was discovered that OST 1.33.16 was not complete. A review of technical specifications at this time revealed a conflict between OST 1.33.16 and the technical specification pertaining to fire detection instrumentation (3.3.3.6). Technical Specification 3.3.3.6 requires surveillance testing of all the smoke detectors, including the ones located in containment on a six month frequency, and does not permit any exclusions based on operating conditions. OST 1.33.16 was immediately satisfactorily performed, so as to verify the operability of the containment smoke detectors.

The root cause of the event has been determined to be inadequate procedure review following a technical specification change. The Administrative Procedures for the Procedures Group and for the Licensing and Compliance Group, are currently being reviewed and revisions will be made as necessary to prevent future incidents of this nature from occurring.

A technical specification change is currently undergoing review in which the fire detectors that are not accessible during plant operation, will be tested during each cold shutdown exceeding 24 hours, unless testing has been performed during the previous six month period. This proposed technical specification change has been approved by the Onsite Safety Committee and is awaiting the Offsite Review Committee's approval.

Although the procedure review which occurs as a result of a proposed technical specification change is not considered to be administratively defective in nature, there have been similar incidents involving missed surveillances due to procedural deficiencies (reference LER 84-005 and LER 84-006).

There were no safety implications to the plant personnel or the public as a result of this inadequate procedure. The containment air temperature is routinely monitored on a eight hour frequency and data is recorded in the station logs.



Duquesne Light

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

August 17, 1984
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Beaver Valley Power Station, Unit No. 1
Docket No. 50334, License No. DPR-66
LER 84-009

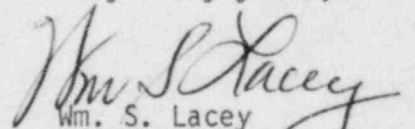
Dr. Thomas E. Murley
Regional Administrator
United States Regulatory Commission
Region 1
Park Avenue
King of Prussia, PA 19406

Gentlemen:

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

LER 84-009, 10 CFR 50.73.a.2.i.B, "Operation (Testing) Prohibited
By Plant's Technical Specifications".

Very truly yours,


Wm. S. Lacey
Station Superintendent

Attachment

1984 AUG 20 PM 2:49
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T. E. Murley
August 17, 1984
NDISS1:2152
Page two

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