

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 January 8 - February 19, 1985, 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 requires the establishment and implementation of procedures covering surveillance and test activities of safety related equipment.

Technical Specification Limiting Conditions for Operation 3.1.2.7 (Modes 5 and 6) and 3.1.2.8 (Modes 1 thru 4) specify minimum volume and boron concentration requirements for the boric acid storage system.

10 CFR 50, Appendix A, General Design Criteria, requires that structures, systems and components important to safety such as the reactivity control systems, shall be designed, fabricated, erected and tested to quality standards commensurate with the importance of the safety functions to be performed. These structures, systems and components are required to withstand the effects of natural phenomena such as earthquakes and are to be designed to assure an extremely high probability of accomplishing their safety functions in the event of anticipated operational occurrences such as a loss of offsite power.

The BVPS Unit 1 Quality Assurance Program defines quality assurance Category I as plant equipment vital to a safe shutdown of the plant, or necessary to mitigate the consequences to the public of a potential accident. Appendix B, Category I Structures, Systems and Components, Revision 3, lists the boric acid tank CH-TK-1A and 1B but excludes the boric acid hold tank BR-TK-7.

Contrary to the above, as of January 27, 1985, OST 1.7.8, Boric Acid Storage Tank and RWST Level and Temperature Verification, allowed the use of boric acid hold tank BR-TK-7, a non-seismic structure and associated delivery pumping system of BR-P-11A and 11B which are not powered from a Class 1E emergency power source, to be used to meet the minimum volume requirements of the boric acid storage system.

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

- B. Technical Specification 4.0.5 requires that components which are classified as ASME Code Class 1, be tested to the criteria of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda. Subsection IWV-3420 of the Code requires that when check valves are leak tested at pressure differentials lower than the function pressure differential, then the observed leakage must be adjusted to the function maximum pressure differential value by calculation

appropriate to the ratio between the test and function pressure differential assuming leakage to be directly proportional to the pressure differential to the one-half power. IWV-3420 further requires that valve seat leakage should be determined during pressure testing by measuring leakage through a downstream telltale connection or by measuring feed rate required to maintain pressure.

Contrary to the above, valve leak rate tests performed during the fourth refueling outage were performed incorrectly as follows:

1. RCS pressure isolation valve leak tests in accordance with OST 1.11.16 were performed using pressures lower than the function maximum pressure differential without adjustment of the observed leakage.
2. Accumulator check valve tests in accordance with OST 1.11.4 were performed without measuring leakage through a downstream telltale connection or by measuring feed rate required to maintain pressure.

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 thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) 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.