

MAR 19 1985

Docket No. 50-334
EA No. 85-28

Duquesne Light Company
ATTN: Mr. John Arthur, President
1 Oxford Center, 301 Grant Street
Pittsburgh, Pennsylvania 15279

Gentlemen:

Subject: Notice of Violation and Proposed Imposition of Civil Penalty

During plant startup following the 1984 refueling outage at Beaver Valley Unit 1, a number of operational events occurred that raise questions regarding the effectiveness of station management controls in assuring the proper coordination of maintenance and operations activities and performance by plant personnel. Inspection Reports 50-334/84-33 and 85-03 were previously sent to your staff and described the results of the inspections conducted and the specific deficiencies in more detail. One of these events resulted in a failure to maintain containment integrity and is the subject of the enclosed Notice of Violation and Proposed Imposition of Civil Penalty. On February 13, 1985, we conducted an Enforcement Conference with Mr. Sieber and other members of your staff to discuss these events, their causes, and planned corrective actions.

Containment integrity was not properly maintained between December 23-26, 1984 because a valve was left open during maintenance, administrative controls were not adequate to assure proper oversight of valve status, and plant personnel did not recognize the seriousness of the open valve until informed by the NRC Senior Resident Inspector on January 7, 1985. The loss of containment integrity constituted a violation of the plant technical specifications. This violation is but one instance of inadequate control of activities during this reactor startup. Other instances include: (1) poor judgment by a licensed operator involving a gross miscalculation of dilution of boron and the lack of proper confirmation during the dilution (Reference NRC Inspection No. 50-334/84-33); and (2) the unnecessary lifting of main steam safety valve(s) when both normal means of steam pressure control were isolated (Reference NRC Inspection 50-334/84-33).

These recent events represent a negative trend in performance during startup activities. In this regard, a Notice of Violation was issued on January 6, 1984 for two previous examples of poor performance near the end of the 1983 refueling outage. In particular, it is our perception that schedular pressures to restart the plant following major outages may be a contributing factor to these events. At the enforcement conference, your staff acknowledged that a negative trend does exist and that the need for improvements at the facility to prevent recurrence is recognized.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

OFFICIAL RECORD COPY
CP PKG BEAVER VALLEY REV 2 - 0001.0.0 - 03/18/85

8504030502 850319
PDR ADDCK 05000334
Q PDR

To emphasize the need for improvements in the management control of startup activities following outages, I have been authorized, after consultation with the Director, Office of Inspection and Enforcement, to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalty in the amount of Fifty Thousand Dollars (\$50,000) for the violation set forth in the enclosed Notice. The violation has been categorized as a Severity Level III violation in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, as revised, 49 FR 8583 (March 8, 1984). The base civil penalty for this type of violation is \$50,000.

You are required to respond to the enclosed Notice and you should follow the instructions specified therein in preparing your response. In your response, you should also address the actions taken or planned to: (1) assure that licensed operators and their supervisors properly review plant conditions before making significant changes; (2) maintain operations staff knowledge of system and component status during operations; and (3) ensure that future reactor startups following outages are conducted under properly controlled conditions. We will examine closely your corrective action and we emphasize that any similar violations in the future may result in additional enforcement action.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosures will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Sincerely,

Original signed by
Thomas E. Murley
Thomas E. Murley
Regional Administrator

Enclosure: Notice of Violation and Proposed Imposition of Civil Penalty

cc w/encl:

C. E. Ewing, QA Manager
W. S. Lacey, Plant Manager
R. Druga, Manager, Technical Services
R. Martin, Nuclear Engineer
J. Sieber, General Manager of Nuclear Services
T. D. Jones, General Manager, Nuclear Operations
R. M. Mafrice, Nuclear Engineer
N. R. Tonet, General Manager, Nuclear Engineering and Construction Unit
NRC Resident Inspector
Commonwealth of Pennsylvania

Duquesne Light Company

- bcc w/encl:
- Public Document Room (PDR)
- Local Public Document Room (LPDR)
- Nuclear Safety Information Center (NSIC)
- Region I Docket Room (with concurrences)
- Public Utility Commission
- ACRS
- SECY
- CA
- T. Murley, RI
- J. M. Taylor, IE
- J. Axelrad, IE
- V. Stello, DED/ROGR
- F. Ingram, PA
- J. Lieberman, ELD
- Enforcement Directors,
RI, RII, RIII, RIV, RV
- H. Denton, NRR
- M. Williams, NRR
- B. Beach, IE
- B. Hayes, OI
- S. Connely, OIA
- IE:ES File
- EA File
- EDO Rdg File
- DCS
- PDR
- NSIC

Dior concurrence was for a package that read like sig tel to a chief executive, that was 3 weeks ago! I believe the message is deleted 3/19/85

RI:ES Holody/gcb 2/15/85	<i>for</i> RI:DRP Troskoski 2/19/85	<i>for</i> RI:DRP Tripp 2/19/85	RI:DRP Wenzinger 2/19/85	RI:DRP Kane 2/20/85	RI:DRP Stanostecki 2/20/85
RI:ROGR Gutierrez 2/26/85	RI:DRP Allan 2/26	RI:RA a/JEM Murley 2/27 13/19/85	HQ:ELD Lieberman	HQ:IF Axelrad	HQ:IE Vollmer
HQ:IE Taylor					

*Rec'd by phone for IE
3/14 DM.*

*Rec'd by phone for IE
3/14 DM*