NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/85

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Beaver Valley Power Station, Unit 1	0 5 0 0 0 3 3 4	1 OF 0 2

TITLE (4)

Surveillance Program Deficiency

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	DOCKET NUMBER(S)
										N/A	0 5 0 0 0
0 5	1 6	8 5	8 5		0 1 2	0 0	0 6	1 4	8 5	N/A	0 5 0 0 0

OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
POWER LEVEL (10)	1 0 0	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
		20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
		20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
		20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
		20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
		20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
	AREA CODE
Robert J. Druga, Manager of Technical Services	4 1 2 6 4 3 - 5 3 0 8

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	
A	X X	X X X	X X X	N							

SUPPLEMENTAL REPORT EXPECTED (14)

		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

During a review of Technical Specification Requirements, against the Technical Specification Surveillance Program, a deficiency was noted on a Surveillance Verification Log. Item 118 of Surveillance Log L5-8 did not contain a reference to Technical Specification 4.5.3. Technical Specification Surveillance 4.5.3 requires the verification of the valve position of the Low Head Safety Injection to the Reactor Coolant Hot Legs, the Low Head Safety Injection to the Reactor Coolant Cold Legs and the High Head Safety Injection to Reactor Coolant Hot Legs with power to the valve operator control circuits disconnected by removal of the plug in the lock out circuit for each circuit, every 12 hours. While correcting this deficiency, it was noted that Technical Specification Surveillance 4.5.3 is required in Mode 4, while Surveillance Verification Log L5-8 is only performed in Modes 1, 2 and 3. An investigation was made to ascertain if the lock out jacks were checked in Mode 4. Positive verification could not be found. The cause for this deficiency in the Surveillance Verification was attributed to personnel error. This surveillance verification will be deleted from Surveillance Verification Log L5-8 and added to Surveillance Verification Log L5-11. Surveillance Verification Log L5-11 is performed in Modes 1 through 4, which satisfies the surveillance requirement of Technical Specification 4.5.3.

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Beaver Valley Power Station, Unit 1	0 5 0 0 0 3 3 4	8 5	— 0 1 2	— 0 0	0 2 OF 0 2

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

To ensure that all procedures referenced in Technical Specification 6.8 and Regulatory Guide 1.33 receive their required reviews and approvals, a matrix was developed to relate surveillance requirements to the appropriate procedures. During development of this Technical Specification and Procedure Matrix, it was noted that Item 118 of Surveillance Log L5-8 did not contain a reference to Technical Specification 4.5.3. Technical Specification 4.5.3 requires the verification of the valve position of the following valves: the Low Head Safety Injection to the Reactor Coolant Hot Legs [MOV-SI-890A, B], the Low Head Safety Injection to the Reactor Coolant Cold Legs [MOV-SI-890C], and the High Head Safety Injection to the Reactor Coolant Hot Legs [MOV-SI-869A, B], and the verification that power to the valve operator control circuits is disconnected by removal of the plug in the lock out circuit from each circuit every 12 hours. During implementation to correct this deficiency, it was noted that Technical Specification Surveillance 4.5.3 is required in Mode 4 (Hot Shutdown), while Surveillance Verification Log L5-8 is only performed in Modes 1, 2 and 3 (Power Operation, Hot Startup and Hot Standby). An investigation was made to ascertain if the lock out jacks were checked during Mode 4 (Hot Shutdown). Positive verification that this check was performed during Hot Shutdown could not be found; however, it was determined that the valve positions were verified during Hot Shutdown by the performance of a separate surveillance test.

The cause for this deficiency in the Surveillance Verification was attributed to personnel error in the initial preparation and review process of the Surveillance Verification Logs. To correct this deficiency, the lockout plug surveillance verification will be deleted from Surveillance Verification Log L5-8 and will be added to Surveillance Verification Log L5-11. Surveillance Verification Log L5-11 is performed in Modes 1 through 4 (Power Operation through Hot Shutdown), which satisfies the surveillance requirement of Technical Specification 4.5.3. To prevent future recurrences, a review of the present administrative procedures governing the revision and generation of Technical Specifications and corresponding surveillance verifications was performed. It has been determined that the existing controls are adequate to prevent future recurrences.

There were no safety implications to the public as a result of this deficiency in the surveillance verification program because the actual valve positions were checked during the required modes of operation and at no time were any valves found out of their required positions.

Duquesne Light

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Beaver Valley Power Station, Unit 1
Docket No. 50-334, License No. DPR-66
LER 85-012-00

Dr. Thomas E. Murley
Regional Administrator
United States Nuclear Regulatory Commission
Region I
Park Avenue
King of Prussia, PA 19046

Gentlemen:

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

LER 85-012-0, 10 CFR 50.73.a.2.i, "Surveillance Program Deficiency".

Very truly yours,

Wm. S. Lacey
Plant Manager

md

Attachment

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