

SEP 10 1993

Docket Nos. 50-334  
50-412

Mr. J. D. Sieber  
Senior Vice President  
Nuclear Power Division  
Duquesne Light Company  
Post Office Box 4  
Shippingport, Pennsylvania 15077

Dear Mr. Sieber:

SUBJECT: COMBINED INSPECTION 50-334/93-12; 50-412/93-13

This letter refers to your August 10, 1993 correspondence, in response to our July 2, 1993 letter, concerning your failure to update an operator aid for a new operating heat-up curve for Unit 1, and to meet your commitment to perform periodic testing of Unit 2 AMSAC.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

*Gene Kelly*

ORIGINAL SIGNED BY:

*jc*  
James C. Linville, Chief  
Projects Branch No. 3  
Division of Reactor Projects

cc:

G. S. Thomas, Vice President, Nuclear Services  
D. E. Spoerry, Vice President, Nuclear Operations  
L. R. Freeland, General Manager, Nuclear Operations Unit  
K. D. Grada, Manager, Quality Services Unit  
N. R. Tonet, Manager, Nuclear Safety Department  
H. R. Caldwell, General Superintendent, Nuclear Operations

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Mr. J. D. Sieber

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cc w/cy of Licensee's Response Letter:  
K. Abraham, PAO, (2 copies)  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
NRC Resident Inspector  
Commonwealth of Pennsylvania  
State of Ohio

**OFFICIAL RECORD COPY**

Mr. J. D. Sieber

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bcc w/cy of Licensee's Response Letter:  
Region I Docket Room (with concurrences)  
W. Lazarus, DRP  
J. Linville, DRP  
W. Butler, NRR  
G. Edison, NRR  
V. McCree, OEDO  
J. Nick, DRSS (see Section 3)  
T. Kenny, DRS (see Section 4.1)  
J. Laughlin, DRSS (see Section 5)  
W. Ruland, DRS (see Section 7.1)  
M. Evans, SRI-TMI

RI:DRP

Rossbach/meo  
9/9/93

RI:DRP

*[Signature]*  
Lazarus  
9/10/93

RI:DRP

*for* *[Signature]*  
Linville  
9/10

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# Duquesne Light Company

Beaver Valley Power Station  
P.O. Box 4  
Shippingport, PA 15077-0004

August 10, 1993

JOHN D. SIEBER  
Senior Vice President and  
Chief Nuclear Officer  
Nuclear Power Division

(412) 393-5255  
Fax (412) 643-8069

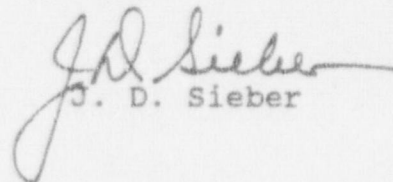
U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

**Subject: Beaver Valley Power Station, Unit No. 1 and No. 2  
BV-1 Docket No. 50-334, License No. DPR-66  
BV-2 Docket No. 50-412, License No. NPP-73  
Combined Inspection Report 50-334/93-12 and 50-412/93-13  
Reply to Notice of Violation and Notice of Deviation**

In response to NRC correspondence dated July 2, 1993, and in accordance with 10 CFR 2.201 and 10 CFR Part 2, Appendix C, the attached replies addresses the Notice of Violation and the Notice of Deviation transmitted with the subject inspection report. This reply is being submitted within 30 days of our receipt of the Notice of Violation and the Notice of Deviation as previously agreed to by the site Resident Inspector.

If there are any questions concerning this response, please contact Mr. N. R. Tonet at (412) 393-5210.

Sincerely,

  
J. D. Sieber

Attachment

cc: Mr. L. W. Rossbach, Sr. Resident Inspector  
Mr. T. T. Martin, NRC Region I Administrator  
Mr. J. C. Linville, Chief, Project Branch No. 3  
Division of Reactor Projects, Region I  
Mr. G. E. Edison, Project Manager  
Mr. M. L. Bowling (VEPCO)



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DUQUESNE LIGHT COMPANY  
Nuclear Power Division  
Beaver Valley Power Station, Unit Nos. 1 and 2

Reply to Notice of Violation

Combined Inspection Report 50-334/93-12 and 50-412/93-13  
Letter dated July 2, 1993

VIOLATION A (Severity Level IV; Supplement I)

Description of Violation (50-334/93-12-C1)

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality have been prescribed by and accomplished in accordance with instructions, procedures, or drawings which include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, on June 8, 1993, an activity affecting quality, reactor coolant system heatup, was not accomplished in accordance with instructions or procedures which included appropriate acceptance criteria in that the operator aid for reactor coolant system pressure and temperature limitations curve, figure OM 50-11, issue 3, revision 8, was of the incorrect revision and contained outdated acceptance criteria.

Reason for Violation

A revision to the Unit 1 Operating Manual was necessary as a result of a new operating cycle heat-up curve. This revision was performed using an Operating Manual Change Notice (OMCN). The distribution of the OMCN requires changing any affected operator aids. The operator aid in this case was the copy of the heat-up curve which is located on the reactor operator's portion of the main control board. While the change to the heat-up curve was properly made in the Operating Manual, the individual performing the distribution inadvertently omitted changing the reactor operator's control board copy. Thus the reason for the existence of the incorrect heat-up curve revision was personnel error.

Corrective Actions Taken

The correct revision of the Unit 1 heat-up curve was immediately placed on the reactor operator's console. Reactor Coolant System pressure and temperature were within the acceptable range of operation when this deficiency was identified.

The remaining operators aids at the Unit 1 operator's console were checked to ensure the proper revisions were in place. It was discovered that the corresponding cooldown curve was also of the incorrect revision, and that curve was also immediately replaced with the correct revision. Data from the Unit 1 cooldown on March 27, 1993 was reviewed and determined to be in the range of acceptable operation for the correct cooldown curve.

Corrective Actions Taken, (Continued)

All remaining Unit 1 curves were verified to be the proper revisions. The corresponding curves located at the Unit 2 reactor operator's console were verified to be the correct revision.

Actions Taken to Prevent Recurrence

The preliminary investigation could not identify the individual who placed the specific OMCNs into the Unit 1 manual. It was determined that numerous individuals could have potentially distributed the heat-up curve changes. Operation's clerks, procedure writers, administrative assistants, and program engineers had previously distributed OMCNs depending on the nature and timeliness of the change. A lack of understanding of the distribution requirements is believed to be the cause for the failure to place a copy of the revised curve on the operator's console.

To preclude recurrence, two letters were issued by the Unit 1 Operations Manager. One letter defined and limited the number of individuals who distribute OMCNs. This action limits the individuals distributing OMCNs to a small group having accountability for maintaining the Operating Manual and operator aids. The second letter clarified the method by which OMCNs are processed, since the preliminary investigation identified the need to simplify and clarify this process. This letter outlines the OMCN distribution process in detail and focuses on the importance of correctly changing the Operating Manual and the operator aids.

In order to further investigate this event and enhance the process of incorporating OMCNs into the Operating Manual, a human performance evaluation will be performed for this event. Additional process improvements will be implemented as necessary to ensure operator aids are the current revision.

Date When Full Compliance will be Achieved

The station is in full compliance at this time.

The human performance evaluation will be completed by November 12, 1993.

DUQUESNE LIGHT COMPANY  
Nuclear Power Division  
Beaver Valley Power Station, Unit Nos. 1 and 2

Reply to Notice of Deviation

Combined Inspection Report 50-334/93-12 and 50-412/93-13  
Letter dated July 2, 1993

Description of Deviation (50-412/93-13-02)

Duquesne Light Company letter, J. D. Sieber to U. S. NRC, "10 CFR 50.62, ATWS Rule Implementation," December 2, 1987, states that periodic testing of AMSAC will include a "functional test of the logic, time delays, and setpoints."

Contrary to the above, periodic testing of Unit 2 AMSAC, including a functional test of the time delays and setpoints, has not been accomplished since original AMSAC installation in 1989.

Reason for Deviation

Operational Surveillance Tests (OSTs) were issued for both Unit 1 and Unit 2 to perform part of the required functional checks. A maintenance procedure to test AMSAC logic, time delays and setpoints was issued to perform the remainder of the functional tests for Unit 1. However, the equivalent procedure for Unit 2 has not yet been developed.

Corrective Actions Taken

A Plant Problem Report (2-93-027) and associated Basis for Continued Operation were written to document and evaluate the deviation.

A task has been initiated on the maintenance tracking system to develop and issue a test procedure for Unit 2 AMSAC. The procedure will be issued and the testing performed during the fourth Unit 2 refueling outage, scheduled to begin in September 1993.

Action Taken to Prevent Recurrence

With the development of this maintenance procedure to test AMSAC logic, time delays, and setpoints, all procedures necessary to perform detailed testing of the Unit 2 AMSAC will be available and will be implemented on an 18 month frequency.

Date When Corrective Actions will be Completed

The procedures to fully test Unit 2 AMSAC will be developed and testing will be completed prior to restart from the fourth Unit 2 refueling outage, scheduled to begin in September 1993.