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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

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. NPF-73
Integrated Inspection Report 50-334/97-04 and 50-412/97-04
Reply to Notice of Violation

In response to NRC correspondence dated June 23, 1997, and in accordance with 10 CFR 2.201, the attached reply addresses the Notice of Violation transmitted with the subject inspection report.

If there are any questions concerning this response, please contact Mr. J. Arias at (412) 393-5203.

Sincerely,

Sushil C. Jain

Attachment

c: Mr. D. M. Kern, Sr. Resident Inspector
Mr. H. J. Miller, NRC Region I Administrator
Mr. D. S. Brinkman, Sr. Project Manager
Mr. P. W. Eselgroth, Chief, Reactor Projects Branch No. 7, Region 1

DUQUESNE LIGHT COMPANY
Nuclear Power Division
Beaver Valley Power Station, Unit No. 1 and No. 2

Reply to Notice of Violation

Integrated Inspection Report 50-334/97-04 and 50-412/97-04
Letter Dated June 23, 1997

VIOLATION A (Severity Level IV, Supplement I)

Description of Violation (50-334(412)/97-04-01)

A. 10 CFR 50, Appendix B, Criterion XVI, states in part, "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected... The identification of the significant condition adverse to quality, the cause of the condition, and the corrective action taken shall be documented and reported to appropriate levels of management."

BVPS procedures 1/2-OM-48.1.C, "Conduct of Operations, Organizational and Responsibilities of the Operations Group," Rev, 1/2-48.5.A, "Conduct of Operations, Logs and Reports," Rev. 10, and 1-OM-54.1.A, "Station Logs, Rev. 0, Require Off-Going Shift Personnel to Certify the Accuracy of All Operating Log Entries Made of Their Shift."

Contrary to the above, the licensee failed to promptly identify conditions that were adverse to quality when plant conditions placed them in Technical Specification limiting conditions of operations (LCOs) as evidenced by the following examples:

1. On May 15, 1997, operators failed to properly certify shift operating log accuracy for shift turnover in that the shift operating logs were incomplete when the NSS and assistant NSS signed over their watch on the shift operating report/log summary sheet and the turnover checklist. Specifically, operators failed to recognize that the logs did not contain entries to document multiple TS LCO action statement entries and exits (3.1.3.2.a, 3.1.3.1.b, 3.0.3, and 3.1.3.2.d) which were applicable in response to observed control rod position indication discrepancies.

2. On March 23, 1997, operators made the train "A" emergency diesel generator (EDG) 2-1 inoperable during bar-over of the EDG in preparation for monthly surveillance run. During the same time period, the supplemental leak collection and release system (SLCRS) train "B" was also

inoperable due to exhaust fan and vortex damper repairs. The nuclear operations shift supervisor failed to recognize and identify that during the 17 minutes when the EDG was unavailable, an LCO (TS 3.0.5) was inadvertently entered since the "A" SLCRS train did not have an operable emergency power supply. This action rendered both trains of SLCRS inoperable.

3. On March 13, 1997, operations supervisors failed to recognize that 2SWS-SOV-130A was inoperable, when in the closed position, which subsequently rendered emergency service water pump 2SWS-P21A inoperable for a 20 hour period. The condition was not identified as a TS LCO (TS 3.7.4.1). The operators reopened 2SWS-SOV-130A, thereby restoring pump operability before the TS action statement allowed outage time was exceeded.

Reasons for the Violation

The events were caused by personnel error.

1. The entry into Abnormal Operating Procedure 1.1.7, "Rod Position Indication Malfunction" was documented on the shift operating log. This procedure references the applicable Technical Specifications. The personnel involved failed to recognize that multiple log entries should have been made for each Technical Specification entry and exit.

2. The control room staff were aware that the "B" train SLCRS fan was inoperable and that the barring over of the 2-1 EDG would render it inoperable. They failed to identify that this would also render the "A" train SLCRS inoperable due to an inoperable emergency power supply, due to personnel error.

3. On March 8, 1997, 2SWS-SOV-130A failed to open upon demand during the transfer of the operating pump's seal water supply from the filtered water system to the service water system. A maintenance work request and condition report were initiated at that time. However, the valve's status was not adequately tracked on the operating log or by a caution tag. As a result on March 13, 1997, operations personnel failed to recognize that the service water pump 2SWS-P21A was inoperable when 2SWS-SOV-130A was closed.

Corrective Actions Taken and Results Achieved

1.a The Technical Specification entries and exits were entered into the computerized log after the shift turnover. However, this action revealed that the computerized log system did not have sufficient controls to identify when late entries had been made. The use of the computerized log system was then suspended until improvements to the system's software and procedures were made.

1.b The Nuclear Shift Supervisor was counseled regarding the failure to log each Technical Specification entry and exit.

1.c A memorandum from the General Manager, Nuclear Operation (GMNO) was issued to the licensed operations staff on May 23, 1997, which discussed the event and areas for improvement. This memorandum reinforced the requirements for logging, including the logging of Technical Specification entries and exits.

2.a The responsible individuals were counseled regarding the failure to recognize that the actions resulted in both trains of SLCRS being inoperable which resulted in the inadvertent entry into Technical Specification 3.0.5.

2.b The Unit 2 diesel generator monthly surveillance tests 2OST-36.1 and 2OST-36.2 were revised by Operating Manual Change Notice (OMCN) 2-97-476 and 2-97-477, respectively, to require a check for Technical Specification 3.0.5 applicability immediately prior to the steps that render the diesel generators inoperable.

3.a The valve 2SWS-SOV130A was successfully stroke tested on March 14, 1997.

3.b Each member of the Unit 2 operating crews reviewed Condition Report 970497, which documented the event, as required reading. This required reading was completed by May 3, 1997.

The concerns regarding inadequate logging and Technical Specification awareness were reviewed by the GMNO at meetings with each operating crew and also at a meeting with the Senior Reactor Operators to reinforce management expectations.

Corrective Actions to Prevent Further Violations

1.a The Operation Standards were revised, effective June 30, 1997, to include a section on Technical Specification logging.

1.b The software and procedures for use of the computerized log system were enhanced to improve the system, including "time and date stamping" of each log entry. This system was returned to service on July 11, 1997.

2.a The Unit 1 diesel generator monthly surveillance tests 1OST-36.1 and 1OST-36.2 were revised by OMCN 1-97-628 and 1-97-629, respectively, to add a step to ensure that no opposite train equipment is inoperable that would affect the performance of the test.

2.b This event will be reviewed in the July 1997 Licensed Operator Retraining Study Guide to reinforce Technical Specification awareness and logging.

3. The Operations Standards were revised, effective June 30, 1997, to include a section on Technical Specification logging.

The recognition and awareness of Technical Specification including the application of appropriate action statements will be emphasized in Licensed Operator Retraining in both classroom and simulator training.

Date When Full Compliance Will Be Achieved

Full compliance was achieved by July 1, 1997, with the reinforcement of management expectations regarding log keeping and Technical Specification awareness with the operating crews and the issuance of the revised Operations Standards.

The review of the July 1997 study guide will be completed by September 15, 1997.

The emphasis of Technical Specification awareness will be covered in Licensed Operator Retraining by December 31, 1997.