

APPENDIX A  
NOTICE OF DEVIATION

Duquesne Light Company  
P.O. Box 4  
Shippingport, Pennsylvania 15077

Docket No. 50-334  
License No. DPR-66

As a result of the inspection conducted on February 1-5, 1988 an apparent deviation was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR 2, Appendix C (Enforcement Policy) (1987), the apparent deviation is set forth below:

NRC Generic Letter 82-33 (GL 82-33) identified basic requirements for upgrading their emergency response capabilities. Duquesne Light Company responded to one of the basic requirements of GL 82-33, upgrading of their Emergency Operating Procedures, in letters dated June 28, 1984 and April 8, 1987. In these letters Duquesne Light Company committed to using an NRC approved Procedures Generation Package (PGP) for upgrading their EOPs. The NRC approved PGP contains detailed instructions for the preparation of the Emergency Operating Procedures and Background Information.

Contrary to the above, as of February 5, 1988, many of Emergency Operating Procedures and the Background Information did not adhere to the guidelines in the the PGP. Some examples of this deviation are as follows:

1. Contrary to PGP Appendix A Section V.E.4.e, Step 7 of EOP ECA-0.0 uses the logic term IF NOT without specifying a first condition by the use of an IF statement.
2. Contrary to PGP Appendix A Section V.H.2, Step 23 of EOP E-0 requires two transitions in the same step and uses "complete" to transition to other steps rather than the recommended term "GO TO".
3. Contrary to PGP Appendix A Section V.F.1 and 6, EOP E-0 page 23 contains a "CAUTION" which lacks identification of the hazard and includes an action statement.
4. Contrary to PGP Appendix A Section V.B.1, Step 5.C of EOP E-3.1 uses two complex sentences which deal with more than one task in an action statement rather than using concise steps which deal with only one task.
5. Contrary to PGP Appendix B Section IV.A.4.e, the Step Description Tables in the Background Information do not include the benchboard identification of the instruments to be used.

Further examples are detailed in the attached inspection report (50-334/88-02).

This condition has been classified as a Deviation (10 CFR 2, Appendix C) applicable to DPR-66.

Pursuant to the provisions of 10 CFR 2, Appendix C, paragraph E(2), Duquesne Light Company is hereby requested 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 deviations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.