

ENCLOSURE 1

NOTICE OF VIOLATION

Duquesne Light Company
Beaver Valley Power Station 1

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

During an NRC inspection conducted from June 28 to August 15, 1998, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, Rev. 1, the violation is listed below:

- A. Technical Specification 6.8.1.a requires that, "written procedures shall be established, implemented and maintained covering... the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978." Appendix "A" of Regulatory Guide 1.33 recommends procedures for surveillance testing, operation, and control of maintenance work (including clearances) for safety related equipment.

Beaver Valley Power Station Operating Manual procedure 1/2OM-48.3.D, "Equipment Administrative Control," Rev. 18, requires that permanently installed valves and equipment will only be operated by personnel of the BVPS Operating Group.

Maintenance Programs Unit Administration Manual (MPUAM), Section 4.2, "Work Order Control," Rev. 7, requires that plant equipment shall not be manipulated unless procedurally controlled by an approved work procedure, a clearance, or a caution tag. MPUAM, Section 4.2 also requires that "all Maintenance related activities (including troubleshooting) SHALL be clearly defined by a work order control document..."

Contrary to the above, on August 8, the inspectors observed a maintenance supervisor manipulate the outboard pump packing supply valve and perform maintenance by adjusting the outboard packing gland nuts without an approved work procedure, clearance, caution tag, or work order during the performance of Operating Surveillance Test, 1-OST 24.9, "Turbine-driven Auxiliary Feedwater Pump (AFW) [1FW-P-2] Operability Test," Rev. 19.

This is a Severity Level IV Violation Supplement 1.

Pursuant to the provisions of 10 CFR 2.201, Duquesne Light Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to

avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at King of Prussia, PA
this 15th day of September, 1998.