



# Duquesne Light

Nuclear Group  
P.O. Box 4  
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February 11, 1986

U. S. Nuclear Regulatory Commission  
Office of Inspection & Enforcement  
Attn: Mr. Stewart D. Ebnetter, Director  
Division of Reactor Safety  
631 Park Avenue  
King of Prussia, PA 19406

Reference: Beaver Valley Power Station, Unit No. 1  
Docket No. 50-334, License No. DRP-66  
Inspection Report 85-25

Gentlemen:

In response to your letter of January 15, 1986, and in accordance with 10CFR2.201, the attached reply addresses the Notice of Violation which was included with the referenced report.

If you have any questions concerning this response, please contact my office.

Very truly yours,

J. J. Carey  
Vice President  
Nuclear Group

#### Attachment

cc: Mr. W. M. Troskoski, Resident Inspector  
U. S. Nuclear Regulatory Commission  
Beaver Valley Power Station  
Shippingport, PA 15077

U. S. Nuclear Regulatory Commission  
c/o Document Management Branch  
Washington, DC 20555

Director, Safety Evaluation & Control  
Virginia Electric & Power Company  
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Director of Nuclear Reactor Regulation  
United States Nuclear Regulatory Commission  
Attn: Mr. Peter S. Tam, Project Manager  
Project Directorate No. 2  
Division of PWR Licensing-A  
Washington, DC 20555

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COMMONWEALTH OF PENNSYLVANIA )  
 ) SS:  
COUNTY OF BEAVER )

On this 11th day of February, 1986,  
before me, Sheila M. Fattore, a Notary Public in and for said  
Commonwealth and County, personally appeared J. J. Carey, who being duly  
sworn, deposed, and said that (1) he is Vice President of Duquesne Light, (2)  
he is duly authorized to execute and file the foregoing Submittal on behalf of  
said Company, and (3) the statements set forth in the Submittal are true and  
correct to the best of his knowledge, information and belief.

Sheila M. Fattore

SHEILA M. FATTORE, NOTARY PUBLIC  
SHIPPINGPORT BORO, BEAVER COUNTY  
MY COMMISSION EXPIRES OCT. 23, 1989  
Member, Pennsylvania Association of Notaries

DUQUESNE LIGHT COMPANY  
Beaver Valley Power Station, Unit No. 1

Reply to Notice of Violation  
Inspection 85-25  
Letter dated January 15, 1986

VIOLATION A (Severity Level IV; Supplement 1)

Description of Violation (85-25-04)

10CFR50, Appendix R, Section III.J, requires that emergency lighting units with at least an 8-hour battery power supply shall be provided in all areas needed for operation of safe shutdown equipment and in access and egress routes thereto.

Contrary to the above, as of November 22, 1985, the emergency lighting units with at least an 8-hour battery power supply were not provided in the following safe shutdown access and egress routes:

1. Clean Shop (Fire Area SH-1)
2. Stairway vestibule immediately outside the Control Room in the Service Building.
3. The corridor between the aforementioned stairway (item 2) and the Service Building roof.
4. The Service Building roof and the Yard Area between the Service Building and the Diesel Generator Building.

Corrective Steps Taken and Results Achieved

An emergency light has been installed in the clean shop to provide lighting for the access pathway.

An exemption request was submitted on January 21, 1986 requesting an exemption from Section III.J of 10CFR50, Appendix R to allow for the use of security perimeter lighting for areas identified in items 2, 3 and 4 above. The exemption request provides justification to demonstrate that the security lighting capability provides an acceptable margin of safety equivalent to the requirements of Section III.J.

Corrective Steps Taken to Avoid Further Violations

With the installation of an additional emergency light in the clean shop for Item 1 and the exemption request justifying equivalency to the requirements of Section III.J of Appendix R to 10CFR50 for items 2, 3 and 4, no further action is required.

Date When Full Compliance Will Be Achieved

Pending satisfactory acceptance of the exemption request for emergency lighting capability, full compliance will be achieved.