

DCS

April 28, 1988

Docket No. 50-334  
License No. DPR-66  
EA 88-83

Duquesne Light Company  
ATTN: Mr. J. D. Sieber  
Vice President  
Nuclear Group  
Post Office Box 4  
Shippingport, Pennsylvania 15077

Gentlemen:

SUBJECT: NOTICE OF VIOLATION  
(NRC Inspection Report No. 50-334/88-12)

This refers to the NRC special safety inspection conducted on March 3-8, 1988 at the Beaver Valley Power Station, Unit 1, to review the circumstances associated with a violation of a technical specification limiting condition for operation which was identified by your staff and reported to the NRC. The inspection report was sent to you on March 10, 1988. During the inspection, a failure to meet a commitment made in the Final Safety Analysis Report (FSAR) was also identified. On March 24, 1988, an enforcement conference was conducted with Mr. J. Sieber and other members of your staff to discuss the violation and deviation, their causes, and your corrective actions.

The violation, which is described in the enclosed Notice, involved the inoperability (for approximately eight days while the reactor was in either the hot shutdown, startup or operations mode) of two of four channels used to actuate the Containment Spray Systems and Phase B Containment Isolation whenever high containment pressure setpoints were exceeded. The channels were inoperable in that their associated bistables were in the bypassed position, and therefore, not capable of performing the intended automatic safety function. The bistables were left in this condition after completion of maintenance surveillance tests performed on February 22, 1988. As a result, although the safety function remained available throughout the period since the other two channels were operable, the "built-in" redundancy for automatic actuation of these systems was lost. At the time the tests were performed, the reactor was in the cold shutdown mode and being prepared for startup.

The procedure used to perform the maintenance surveillance test specified that if the reactor was in the cold shutdown or refueling modes, the bistables were to be returned to the bypassed position upon completion of the test. Apparently, it was envisioned that the startup checklist performed prior to entering the hot shutdown condition would identify this bypassed condition and return the bistables to the proper position prior to startup. However, the startup checklist had been performed approximately six hours prior to the performance

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of the maintenance surveillance test for those two channels. As a result, the bistables were not placed in the bypassed position until after the startup checklist had been completed.

The NRC notes that a similar maintenance surveillance test on the other two channels had been performed just prior to performance of the startup checklist, and those channels were left in the bypassed position, in accordance with the procedure, upon completion of the test. However, those two channels were returned to the normal position when identified during the performance of that startup checklist. If the checklist had been performed but a few hours earlier, all four bistables could have been left in the bypassed position, which would have rendered all four channels inoperable.

The NRC is concerned that the specific maintenance surveillance test procedure, although requiring that the operations department be notified when the surveillance was completed, did not require that the operations department be informed that the equipment was left, at the completion of the test, in a configuration other than existed at the beginning of the surveillance. If the operations department had been notified of this condition, additional checks could have been performed at that time to ensure restoration of the bistable to the normal position prior to entering the hot shutdown mode. Furthermore, when these channels were in the bypassed position, there was no indication in the control room of this condition, contrary to a commitment in the FSAR. Apparently, although there was control room indication at the time the commitment was made in the FSAR, this indication capability was lost during a modification made at the facility in 1980. A change to the FSAR was never made. The failure to satisfy this commitment, which is described in the associated inspection report, is also of concern since the violation could have been prevented if control room indications existed.

In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violation described in the enclosed Notice has been classified at Severity Level III. A civil penalty is considered for a Severity Level III violation. However, after consultation with the Director, Office of Enforcement and the Deputy Executive Director for Regional Operations, I have decided that a civil penalty will not be proposed in this case because (1) the violation was identified by your staff and promptly reported to the NRC, and (2) your "root cause" analysis of this event was very thorough, and corrective actions taken subsequent to that analysis were unusually prompt and extensive. By this action, the NRC does not minimize the significance of the violation. Rather, your actions in response to the violation and described in the enforcement conference demonstrate that you recognize the significance of this violation. It is clearly not acceptable to operate in a condition where the loss of one additional channel could defeat initiation of containment spray and automatic containment isolation. The NRC emphasizes that any similar violations in the future will result in additional enforcement actions.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notices when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. In addition, you should describe the actions taken or planned to assure that FSAR commitments are met, or if changed, are changed in accordance with the requirements of 10 CFR 50.59 and 50.71. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL No. 96-511.

Sincerely,

Original Signed By  
WILLIAM T. RUSSELL

William T. Russell  
Regional Administrator

Enclosure:  
Notice of Violation

cc w/encl:

J. J. Carey, Executive Vice President, Operations  
J. O. Crockett, General Manager, Corporate Nuclear Services  
W. S. Lacey, General Manager, Nuclear Operations  
N. R. Tonet, Manager, Nuclear Engineering  
T. P. Noonan, Plant Manager  
C. E. Ewing, QA Manager  
K. D. Grada, Manager, Nuclear Safety  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
NRC Resident Inspector  
Commonwealth of Pennsylvania

bcc w/encl:  
 Region I Docket Room (with concurrences)  
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 S. Connelly, OIA  
 P. Robinson, OE  
 R. Cunningham, NMSS  
 D. Nussbaumer, OGP/SP  
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 R. Benedict, NRR  
 B. Clayton, EDO

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RI:RA Russell 4/26/88	NRR Miraglia 4/ /88	OGC Chandler 4/ /88	OE Lieberman 4/ /88	DEDO Taylor 4/ /88	

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*Rec'd by phone to OE  
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