

Duquesne Light Company

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L-98-199

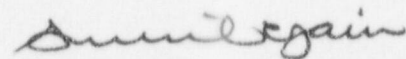
U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

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 50-334/98-04 and 50-412/98-04
Reply to Notice of Violation

In response to NRC correspondence dated September 15, 1998, 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. S. H. Hobbs at (412) 393-5203.

Sincerely,



Sushil C. Jain

Attachment

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

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

Reply to Notice of Violation

Integrated Inspection Report 50-334/98-04 and 50-412/98-04
Letter Dated September 15, 1998

VIOLATION (Severity Level IV, Supplement I)

Description of Violation (50-334/98-04-01)

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.

Reason For The Violation

The maintenance supervisor perceived that the turbine driven auxiliary feedwater pump 1FW-P-2 was being damaged, and failed to properly communicate his concerns to the operator stationed at the pump, and then engaged in actions which violated station procedures. The operator also did not use his authority to stop and question the maintenance supervisor's actions.

Corrective Actions Taken and Results Achieved

On August 10, 1998, the maintenance supervisor was counseled on the event and the need to follow procedures and meet workplace standards. This was followed up with a written letter of discipline dated September 9, 1998.

On August 8, 1998, Operations management discussed the event with the operator who was stationed at the pump. This discussion reaffirmed Operations ownership of station equipment and Operations responsibility to interrupt any inappropriate actions observed.

Condition Report 981553 was written on August 10, 1998, to document the problem for evaluation and resolution under the corrective action program.

Corrective Actions to Prevent Further Violations

The Vice President, Nuclear Operations and Plant Manager will issue a letter to site personnel by November 2, 1998, to reinforce the site requirements for operation and maintenance of station equipment.

This event will be reviewed by active duty Operations shift personnel by December 15, 1998, to reaffirm Operations ownership of station equipment and the responsibility to interrupt any inappropriate actions observed.

This event will be reviewed by active duty System and Performance Engineering Department (SPED) personnel by December 15, 1998, to reinforce the site requirements for operation and maintenance of station equipment.

Maintenance Programs Unit (MPU) craft and their immediate supervisory personnel will review the event, the requirements that need to be met before performing work on station equipment, and the MPU standards for professionalism and communications in their respective continuing training programs. This training will be completed for active duty personnel by February 28, 1999.

Training regarding site requirements for operation of station equipment will be enhanced by adding this operating experience to the General Employee Refresher Training (GERT) and Plant Access Training (PAT) programs by November 30, 1998.

Date When Full Compliance Will Be Achieved

Full compliance was achieved with the repair and return of 1FW-P-2 to operable status on August 9, 1998.

The letter to site personnel will be issued by November 2, 1998.

Reply to Notice of Violation

Inspection Report 50-334/98-04 and 50-412/98-04

Page 3

The event will be reviewed by Operations and SPED personnel as described above by December 15, 1998.

Training of MPU personnel as described above will be completed by February 28, 1999.

The event will be incorporated into the GERT and PAT programs by November 30, 1998.