

ENCLOSURE 1

NOTICE OF VIOLATION

Duquesne Light Company
Beaver Valley Unit 1

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

During an NRC inspection conducted from October 5 - November 15, 1997, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below.

- A. Unit 1 Technical Specification (TS) 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, Revision 2, February 1978," which includes radiation protection procedures. This requirement is partially implemented by the site Health Physics Manual, which requires in Chapter 1, Part II, Section E.2.g, that individuals shall comply with the provisions of their radiological work permit (RWP) and any supplementary posted material for work in the radiologically controlled area (RCA). All licensee RWPs require the user to review the radiological conditions of their work area by reviewing the posted area survey maps.

Contrary to the above, workers were found during the period of October 6-8, 1997, in the radiologically controlled areas (primary auxiliary and containment buildings), who had not reviewed their survey maps prior to entry and were unaware of the radiological conditions in their work and travel areas in the RCA.

This is a Severity Level IV violation (Supplement IV).

- B. Unit 1 Technical Specification (TS) 6.8.1.a requires that, "Written procedures be established, implemented and maintained covering...the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978," which includes procedures for radiation monitoring system (RMS) operation.

Contrary to the above, the licensee failed to establish adequate RMS calibration instructions in regard to determining RMS operating high voltage. Specifically, operating high voltage was not established on a plateau for RM-1RM-215A (Unit 1 Containment Particulate) and RM-1LW-104 (Unit 1 Liquid Waste Effluent). This was contrary to vendor manual "Victoreen installation, Operation, and Maintenance, Instruction Manual Beta Scintillation Detectors Models 843-20, 843-20A, and 843-20B" and "Victoreen Instructional Manual Gamma Scintillation Detector Model 843-30" respectively; and was contrary to RMS calibration standards and industry guidance documents.

This is a Severity Level IV violation (Supplement IV).

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; (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 to show cause 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.

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 26th day of November, 1998