



Duquesne Light

Nuclear Group
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August 8, 1986

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Attn: Mr. Edward C. Wenzinger, Chief
Projects Branch No. 3
Division of Reactor Projects
Region 1
631 Park Avenue
King of Prussia, PA 19406

Reference: Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66
Inspection Report 86-11

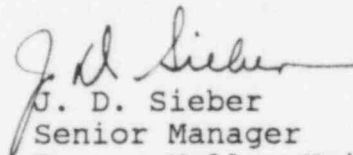
Gentlemen:

In response to your letter of July 3, 1986, and in accordance with 10 CFR 2.201, the attached reply addresses the Notice of Violation which was included with the referenced report.

This response is being submitted late with the concurrence of the site NRC Sr. Resident Inspector.

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

Very truly yours,


J. D. Sieber
Senior Manager

Beaver Valley Unit No. 1

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
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Washington, DC 20555

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DUQUESNE LIGHT COMPANY
Beaver Valley Power Station
Unit No. 1

Reply to Notice of Violation
Inspection 86-11
Letter Dated July 3, 1986

VIOLATION A (Severity Level IV: Supplement 1)

Description of Violation (86-11-02)

10 CFR 50, Appendix B, Criteria XI, Test Control, requires the establishment of a program to assure that all testing required to demonstrate that structures, systems and components will perform satisfactorily in service is performed in accordance with the requirements and acceptance limits contained in applicable design documents.

Contrary to the above, it was determined on May 22, 1986, that all features of the Backup Indicating Panel (installed prior to January 5, 1985, to meet the 10 CFR 50, Appendix R, Fire Protection safe shutdown requirements) were not tested to assure that they would perform satisfactorily in service by performing their intended design functions.

Specifically:

1. A complete sensor to indicator functional test was not performed on the cold leg reactor coolant system temperature indicators. As a result, functional testing did not identify that the instruments were incorrectly wired and inoperable.
2. No test was conducted to assure the keys provided for the BIP locking transfer switches, which are necessary to transfer indication from the control room to the panel, would work. These keys did not fit the core of the lock, making actual transfer impossible.

Corrective Actions Taken

As noted in the Inspection Report the necessary wiring changes have been made and the BIP cold leg indication is operable. In addition, the correct keys were permanently attached to the key rings and verified as fitting the BIP locking transfer switches. Operations Surveillance Test 1.45.9 which tests the instrumentation channels at the BIP was completed satisfactory.

Action Taken to Prevent Recurrence

The Nuclear Engineering Management Procedure 2.7 "Engineering Specifications" will be revised to clearly establish minimum content requirements for design change test specifications. The minimum requirements will be consistent with the testing requirements for returning equipment to service as specified in Quality Assurance Procedure OP-11, "Control of Maintenance and Modification".

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Date When Full Compliance will be Achieved

Nuclear Engineering Management Procedure 2.7 will be revised by
September 30, 1986.