

# Duquesne Light Company

Beaver Valley Power Station  
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September 17, 1997  
L-97-025

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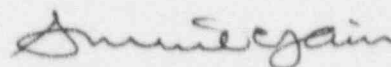
U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555-0001

**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 50-334/97-05 and 50-412/97-05**  
**Reply to Notice of Violation**

In response to NRC correspondence dated August 18, 1997, 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. J. Arias at (412) 393-5203.

Sincerely,



Sushil C. Jain

## Attachment

- c: Mr. D. M. Kern, Sr. Resident Inspector  
Mr. H. J. Miller, NRC Region I Administrator  
Mr. D. S. Brinkman, Sr. Project Manager  
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 50-334/97-05 and 50-412/97-05  
Letter Dated August 18, 1997

**VIOLATION A (Severity Level IV, Supplement I)**

**Description of Violation (50-334(412)/97-05-05)**

10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," states in part, "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition..."

Technical Specification 6.8.1.a requires that, "Written procedures shall be properly established, implemented, and maintained covering...the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978.

Regulatory Guide 1.33 requires that "Maintenance activities that can affect the performance of safety-related equipment should be properly pre-planned and performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances..."

Contrary to the above, previous corrective actions were inadequate in that on July 1, 1997, an unplanned engineered safety feature actuation, specifically, the P-12 High Steam Flow - Safety Injection Block Permissive Interlock, occurred during troubleshooting activities on the Unit 1 main condenser steam dump system due to inadequate work instructions and poor operator communications. Corrective actions taken to address inadequate control of troubleshooting that resulted in an inadvertent actuation of the Control Room Emergency Air Breathing Pressurization System on October 6, 1996, and inadvertent opening of two Unit 2 atmospheric steam dumps during secondary process rack troubleshooting on February 3, 1997, were ineffective in that they failed to preclude the July 1 event.

### Discussion of the Violation

The two previous events of October 6, 1996 and February 3, 1997 referenced in the Notice of Violation have been reviewed. The corrective actions implemented for these two events were effective in preventing recurrence of the specific conditions. However, an aggregate review of troubleshooting events determined that a concern still exists with troubleshooting practices and a Condition Report (CR) was initiated on July 24, 1997.

### Reasons for the Violation

Prior to the implementation of the CR Program, the site corrective action programs did not provide a formal means of evaluating the extent of condition for plant problems. Without this extent of condition review, the corrective action programs did not consistently assure that similar events were identified when developing corrective actions.

The reason for the July 1, 1997 event was a human performance problem that resulted in the work package not containing adequate troubleshooting information necessary to remove the Unit 1 main condenser steam dump system from service without affecting other operating equipment. The existing work planning procedure (MPUAP 7.1) has an attachment which provides guidance on troubleshooting. This guidance was not fully utilized during work planning process for the Maintenance Work Request generated for the work on the Unit 1 steam dump system on July 1, 1997.

### Corrective Actions Taken and Results Achieved

Management expectations regarding the use of current programs for troubleshooting energized equipment have been reinforced with planners, instrument & control (I&C) and electrical technicians. This item is complete.

The CR Program, which was implemented on January 1, 1997, now provides a formal means of evaluating plant problems for extent of condition.

CR 971304 was initiated on July 24, 1997, due to examples of weaknesses in maintenance troubleshooting practices and techniques which occurred during the previous six month period. This CR will evaluate the effectiveness of the troubleshooting guidelines contained in MPUAP 7.1.

Corrective Actions to Prevent Further Violations

Details of this particular event are discussed in a maintenance training brief, which was prepared and distributed to planners, I&C and electrical technicians and supervisors. This training brief describes the July 1, 1997 event and instructs personnel that when working on energized equipment, they must assure themselves that they fully understand what the effects of the activity will be on the plant. This training will be completed by September 30, 1997.

The following programmatic improvements to the site troubleshooting process are being made:

- A self-assessment of the site troubleshooting process has been initiated. The assessment will be completed by September 30, 1997.
- The recommendations of the self-assessment will be implemented as appropriate by March 31, 1998.

Date When Full Compliance Will Be Achieved

The CR 971304 evaluation will be completed by January 16, 1998.

The programmatic improvements to the site troubleshooting process will be completed as follows:

- The self-assessment of the site troubleshooting process will be completed by September 30, 1997.
- The recommendations of the self-assessment will be implemented as appropriate by March 31, 1998.