

SEP 17 1986

Docket No. 50-334

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

Gentlemen:

Subject: Inspection No. 86-10

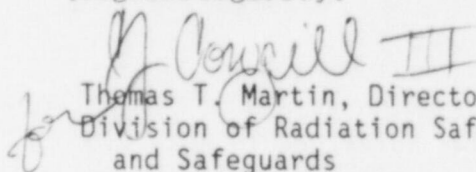
This refers to your letter dated August 20, 1986, in response to our letter dated July 16, 1986.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:


Thomas T. Martin, Director
Division of Radiation Safety
and Safeguards

cc:

H. M. Siegel, Manager, Nuclear Engineering Department
C. E. Ewing, QA Manager
W. S. Lacey, Station Superintendent
R. Druga, Chief Engineer
R. Martin, Nuclear Engineer
J. Sieber, Manager, Nuclear Safety and Licensing
T. D. Jones, Manager, Nuclear Operations
N. R. Tonet, Manager, Nuclear Engineering
Public Document Room (PDR)
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Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
Commonwealth of Pennsylvania

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bcc:
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RAP
DRS:RI
McFadden/pj
9/16/86

RAP
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MS
DRS:RI
Shanbaky
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QJF
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Duquesne Light

Nuclear Group
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Telephone (412) 393-6000

August 20, 1986

U. S. Nuclear Regulatory Commission
Attn: Thomas T. Martin, Director
Division of Engineering & Technical Programs
Region 1
631 Park Avenue
King of Prussia, PA 19406

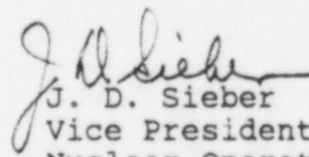
Reference: Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66
NRC Inspection 86-10

Gentlemen:

Section 6 of Inspection Report 86-10 dated July 16, 1986 discussed several inadequacies in our air sampling program (Section 6, items A through G). We have reviewed these inadequacies and have taken measures to strengthen the program in these specific areas. Corrective actions taken to address the specific inadequacies are included as Attachment A to this letter. In each case, the specific inadequacy is repeated and our corrective action stated.

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

Very truly yours,


J. D. Sieber
Vice President
Nuclear Operations

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
c/o Document Management Branch
Washington, DC 20555

Director, Safety Evaluation & Control
Virginia Electric & Power Company
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DUQUESNE LIGHT COMPANY
Beaver Valley Power Station
Unit No. 1

ATTACHMENT A
Reply to NRC Inspection 86-10

ITEM A

Lack of specific procedural guidance on the types of air samples required for opening primary systems.

Response

RP 7.3, Air Sampling, Field Evaluation and Sample Assessments, will be revised to include specific guidance as to when filter paper and charcoal samples are required when opening primary systems. The procedure will be revised prior to September 15, 1986.

ITEM B

The air sample log books were disorganized and hard to follow.

ITEM E

Count room technicians were not familiar with the air sampling log book or the sample counting priority system.

Response to Items B and E

The air sample log will be revised to provide an organized system for determining sample counting priority. The revised air sample log will be reviewed by the technicians to assure their familiarity. The log will be revised prior to September 30, 1986.

ITEM C

Air sample results were missing and presumed lost on several occasions.

ITEM G

Numerous recordkeeping errors/poor recordkeeping, i.e., mathematical errors in calculation of times during which respirators worn, individual's badge numbers missing, and multiple crossouts/writeovers without initialing and dating.

Response to Items C and G

To minimize the above-referenced concerns, the following actions will be taken prior to major shutdowns when outside contractors are utilized to supplement the Radiological Control Department staff.

1. The air sampling program portion of the site specific Radcon contractor training will be upgraded. The upgrading will be directed to correcting the identified inadequacies.
2. Specific Radiological Control supervision will be assigned the responsibility for ensuring the requirements of the air sampling program are performed in accordance with established procedures.

ITEM D

Field evaluations of air samples provide a high LLD (often $>5 \times 10^{-9}$ $\mu\text{Ci/cc}$) which would be 25% of MPC.

Response

The intent of the field evaluations is to provide rapid determination of the magnitude of any airborne radioactivity that may be present. These evaluations enable implementation of corrective actions that may be necessary without delay, i.e., actions may be initiated prior to obtaining radionuclide analysis of samples.

RP 7.3, Air Sampling, Field Evaluation and Sample Assessment, will be revised to provide specific guidance as to actions that are required based on field evaluation results, i.e., graded response that may require immediate or follow-up actions. The procedure will be revised prior to September 15, 1986.

ITEM F

On multiple occasions, count room technicians used an incorrect counting geometry (47 mm filter paper vs. CESCO cartridge) to count iodine cartridges. However, the geometry used provided a conservative estimate of actual concentrations.

Response

On occasions, count room technicians used the 47 mm filter paper sample holder (that accommodated the smaller breathing zone charcoal cartridges) to count the breathing zone charcoal cartridges. This resulted in the use of an incorrect counting geometry. Technicians assigned to counting room activities were instructed verbally and by memo as to the correct counting geometry for counting breathing zone charcoal cartridges. The correct counting geometry was being used effective June 5, 1986.