



Duquesne Light

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Pittsburgh, Pennsylvania
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April 24, 1979

United States Nuclear Regulatory Commission
Attention: Mr. Boyce H. Grier, Director
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Reference: Beaver Valley Power Station, Unit No. 1
Docket No. 50-334
License No. DPR-66
IE Inspection Report No. 79-05

Dear Mr. Grier:

In response to your letter of April 4, 1979 and in accordance with 10 CFR 2.201, the attached reply addresses the Notice of Violation which was included as Appendix A of the referenced Inspection Report. The noted violations included: (A) failure to replace expired respirator cartridges at the remote emergency control center, (B) failure to follow training requirements of the EPP, and (C) lack of adequate procedures/equipment to meet EPP requirements.

Your letter noted that immediate action steps corrected Item A at the time of the inspection. Therefore, only the steps that have been taken to avoid recurrence of that item are addressed in our reply.

Duquesne Light shares your concerns over the recurrent items and believes that the planned corrective actions will insure against further items of noncompliance.

Very truly yours,

C. N. Dunn
Vice President, Operations

Attachment

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DUQUESNE LIGHT COMPANY
Beaver Valley Power Station
Unit No. 1

REPLY TO NOTICE OF VIOLATION
Inspection No. 79-05
Letter Dated April 4, 1979

INFRACTION A

Description Of Infraction (79-05-05)

Section 6.8.1 of the Appendix A, Technical Specifications (TS) requires, in part, that procedures pertinent to emergency planning be implemented. BVPS Emergency Preparedness Plan, Appendix C, "Emergency Equipment Checklist and Calibration Procedure", Issue 4, written pursuant to the above requirement, specifies, in part, that respirators and cartridges be checked according to the BVPS Radcon Manual, Chapter 3, Part 10. The Radcon Manual requires that outdated respirator cartridges be replaced promptly.

Contrary to these requirements, respirator cartridges in Emergency Kits 4 and 5, at the remote emergency control center, became outdated in October, 1977 and were not replaced until November 4, 1978.

Discussion Of Infraction

It should be clarified that this item was a licensee-identified item which was promptly corrected the same day (November 4, 1978), as recorded on the EPP Inventory Checklists.

The circumstances described in the report show the infraction item was due to one of the following:

- 1) The inventory checks were being performed in a careless manner.
- 2) Outdated respirator cannisters were placed in the kits by error.
- 3) The checklist data sheets are inadequate.

The manufacturer recommends a three year expiration date (with the seal unbroken) due to the unpredictability of storage conditions. If the cannisters are stored in a humid, moisture-filled atmosphere, the performance of the chemical bed within the cannister may become less effective. Each respirator cartridge in the Emergency Kits is stored in a separate poly bag, remotely stored in cabinets with the seal unbroken, thereby protecting the chemical cannisters from damage. In the event an emergency had occurred, and the four respirators at the remote ECC were required, the effectiveness and serviceability of the outdated cannisters would not have jeopardized the wearer.

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Action Taken To Prevent Recurrence

To prevent recurrence, a special investigation has been undertaken to determine and correct the problem(s). The EPP checklist data sheets will be revised by June 30, 1979 to include provisions for recording expiration dates of the respirator cartridge cannisters and any replacement units will be recorded on the checklists. Special attention will be given to the Quarterly Inventory Checklists by performance of spot-check independent audits over the next six months by the supervisor responsible for EPP equipment deficiency followup actions to ensure accurate inventory performance. Disciplinary action will be taken, as necessary, for any future incorrect inventory performance.

Date On Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.

INFRACTION B

Description Of Infraction (79-05-02)

Section 6.8.1 of the Appendix A, TS requires, in part, that procedures pertinent to emergency planning be implemented. Section 9.2 of the BVPS Training Manual, "Emergency Preparedness Plan", established pursuant to this requirement, specifies, in part, that the following assigned emergency organization personnel be trained/retrained each two years by completing an assigned Selective Emergency Preparedness Plan Training Checklist: ECC Chief; Assistant ECC Supervisor; Communications Operator; Data Recorder and Mapper; Monitoring Teams; and Emergency Squad Members.

Contrary to the above requirements, as of March 2, 1979, the following assigned emergency organization personnel had not completed the assigned Selective Emergency Preparedness Plan Checklist within the last two years:

- ECC Chief - 1 of 3 assigned
- Assistant ECC Supervisor - 3 of 3 assigned
- Communications Operator - 10 of 12 assigned
- Data Recorder and Mapper - 15 of 18 assigned
- Monitoring Teams - 10 of 24 assigned
- Emergency Squad Members - 49 of 97 assigned

Corrective Action

All Station Staff completed the required training prior to the EPP drill held on March 29, 1979.

Action Taken To Prevent Recurrence

Station supervisors were reinstructed, by the Station Superintendent, in the importance of meeting all Station commitments in a timely fashion, especially those that are reoccurring, whose activities are pre-planned. Station supervisors were also directed to take disciplinary action if training has not been completed as required.

A complete reevaluation of EPP training/retraining will be performed prior to the next scheduled retraining cycle.

Date On Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.

INFRACTION C

Description Of Infraction

Section 6.8.1 of the Appendix A, TS requires, in part, that procedures pertinent to emergency planning be established and implemented. The BVPS Emergency Preparedness Plan requires that specific notifications/recommendations be made by the licensee if airborne I-131 concentrations exceed a specified action level of 1×10^{-10} microcuries/cc in offsite locations. BVPS EPP Procedure IIB-6, written pursuant to the above requirements, details the sampling and analytical techniques to be used to measure the above concentrations.

Contrary to these requirements, as of March 2, 1979, the combination of procedures/emergency kit equipment was inadequate to meet the requirements, in that, the action level of 1×10^{-10} microcuries/cc of I-131 could not be measured with the existing instrumentation and procedures.

Discussion Of Infraction

The Beaver Valley Power Station Emergency Preparedness Plan specified Offsite Administrative Protective Action Levels which proved to be unduly restrictive and possibly difficult to verify under certain conditions. Identification of the restrictive Offsite Protective Action Levels required actions as described.

Corrective Action

The Offsite Administrative Protective Action Levels have been deleted from the Beaver Valley Emergency Preparedness Plan in accordance with 10 CFR 50.59. Required actions are now based only on the Pennsylvania State Department of Environmental Resources Protective Action Guides.

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Action Taken To Prevent Recurrence

An evaluation will be conducted and Alert Action Levels will be derived that will provide guidance for monitoring teams and emergency control center personnel. The BVPS EPP implementing procedures will be revised to this effect to include the derived Alert Action Levels which would be dependent on plant startup (Iodine source) and availability of supply equipment for testing.

Date On Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.

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