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September 5, 1979

United States Nuclear Regulatory Commission
Attention: Mr. Eldon J. Brunner, Chief
Reactor Operations and Nuclear
Support Branch

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. 79-09

Dear Mr. Brunner:

In response to your letter of August 10, 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 violation was the failure to perform a surveillance test for the Supplementary Leak Collection and Release (SCLRS) Filter Banks.

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

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. 79-09
Letter Dated August 10, 1979

Description Of Infraction (79-09-05)

Technical Specification 4.7.8.1.c states, in part, "Each Supplementary Leak Collection and Release System exhaust air filter train shall be demonstrated OPERABLE: ... c. At least once per eighteen months by: ... 2. Verifying that the air flow distribution to each HEPA filter and charcoal absorber is within + 20% of the averaged flow per unit. Technical Specification 6.8.1.c states, in part, "Written procedures shall be established, implemented and maintained covering ... c. Surveillance and test activities of safety related equipment.

Contrary to the above, the verification required by Technical Specification 4.7.8.1.c.2 has not been performed since August 1975 and procedures to perform that verification have not been established or maintained as part of the licensee's surveillance test program.

Corrective Action

The immediate corrective action to resolve the subject noncompliance was to test the SLCRS exhaust air filter train in accordance with the technical specification requirement. This was completed on May 15, 1979.

Action Taken To Prevent Recurrence

The station is currently reviewing this technical specification requirement for a potential change to the eighteen (18) month performance period. Basis for this change is the ANSI N510 requirement for Airflow Capacity, Distribution and Residence Time Tests, i.e. "acceptance tests are to be made after completion of initial construction and after any major system repair or modification". Until this change is initiated, approved and incorporated into the technical specifications, air flow distribution tests will continue to be performed in compliance with the eighteen (18) month interval. This test will be added to the station Technical Specification Surveillance Procedure Scheduling List.

Date On Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.

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