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September 4, 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. 79-12

Dear Mr. Brunner:

In response to your letter of August 8, 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 implement procedure steps during Type "C" Leak Rate Testing.

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. 79-12
Letter Dated August 8, 1979

Description Of Deficiency (79-12-09)

Technical Specification 6.8.1 states, in part, that "Written procedures shall be established, implemented, and maintained..."

1. Operation Surveillance Test (OST) No. 1.47.4, "Containment Isolation Valve Leakage Test, Type C", Rev. 11, page 12, paragraph G requires that rotameters used for tests have a calibration check performed weekly and that NSQC witness and document the results of the rotameter check.
2. OST 1.47.29, "Penetration #38 Type C Leak Test" and OST 1.47.83, "Personnel Air Lock Type B Test" require that leakage be recorded in the station logs, Log Sheet C2 Containment Penetration Type "C" Leak Test Record.

Contrary to the above, procedures were not implemented in that:

1. NSQC did not witness or document the results of the calibration checks for rotameters FI-101A, FI-101B and FI-102C, which were used for leakage measurement during the Fall, 1978 Containment Isolation Valve Leakage Test Program; and
2. As of May 18, 1979, Log Sheet C2 of the station logs was not updated with leakage from the most recent performance of OSTs 1.47.29 and 1.47.83 although the step requiring the update was initialled as complete.

Corrective Action

1. Although weekly calibration checks of rotameters were not documented, the rotameters were later checked and found to be within calibration as noted in the inspection report in the closing of unresolved item 78-27-06.
2. The C2 log sheets have been updated with the leakage values from the noted surveillance tests.

Action Taken To Prevent Recurrence

1. A step requiring a verification signature by NSQC has been added to the surveillance test to provide proper documentation of calibration check.
2. A letter from the Operations Supervisor has been sent to all operating personnel to remind them of their responsibilities when verifying the completion of a procedure action.

Date On Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.

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