



Duquesne Light

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October 10, 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. 79-16

Dear Mr. Brunner:

In response to your letter of September 18, 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 properly implement procedures for jumper and lifted lead control.

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

Very truly yours,

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. 79-16
Letter Dated September 18, 1979

Description Of Deficiency (79-16-01)

Technical Specification 6.8.1 states, in part, "Written procedures shall be established, implemented and maintained covering the activities referenced below: a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, November 1972 ..." Regulatory Guide 1.33, Appendix A, identifies the following as a typical safety related activity which should be covered by written procedures: "A.10 Bypass of Safety Functions and Jumper Control". The BVPS Operating Manual, Section 1.48.5.D.2.b, requires, in part, that each entry in the Jumper and Lifted Lead log include the following: "(3) Elementary Control Schematic number where the jumper or lifted lead effect on the control circuit can be seen. ... (5) The reason jumper placed or lead lifted with sufficient information to clearly identify location on the schematic. ... (7) The location of jumper or lead (breaker compartment/panel board)..."

Contrary to the above, on July 11, the following active Jumper and Lifted Lead log entries, listed by Tag Number, did not comply with one or more of the above requirements of the BVPS Operating Manual: Tag Numbers 1519-1520, 1792-1793, 1834-1837, 1863-1865, 1965-1967, 2065-2069, 2080-2087, 2106-2118, 2136-2137, and 2158-2170.

Discussion Of Deficiency

It is agreed that in some cases the tags did not contain all the information required by the BVPS Operating Manual.

However, it was demonstrated to the auditor at the time of the inspection that sufficient information was available, when utilized with indexes and drawings available to the shift supervisor, that all tags were adequately described as to not constitute an unsafe condition. Since accountability was provided the intent of the log was fulfilled.

Corrective Action

A review of the Jumper and Lifted Lead Log was initiated to verify compliance with Chapter 48 of the BVPS Operating Manual.

Action Taken To Prevent Recurrence

The administrative requirements concerning the maintenance of this log will be reassessed and Chapter 48 of the BVPS Operating Manual will be revised accordingly.

Date On Which Full Compliance Will Be Achieved

Full compliance will be achieved by October 15, 1979.

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