



Duquesne Light

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September 19, 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

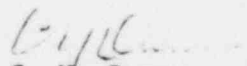
Reference: Beaver Valley Power Station, Unit No. 1
Docket No. 50-334
License No. DPR-66
IE Inspection Report No. 79-14

Dear Mr. Brunner:

In response to your letter of August 24, 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 monitor Reactor Coolant System and Pressurizer heatup and cooldown rates; (b) failure to properly control temporary changes; and (c) failure to report a reportable occurrence.

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. 79-14
Letter Dated August 24, 1979

A. INFRACTION

Description Of Infraction (79-14-02)

- Technical Specification 4.4.9.1.a states, "The Reactor Coolant System temperature and pressure shall be determined to be within the limits at least once per 30 minutes during system heatup, cooldown, and inservice leak and hydrostatic testing operations."
- Technical Specification 4.4.9.2 states, in part, "The Pressurizer temperatures shall be determined to be within the limits once per 30 minutes during system heatup or cooldown...."
- Technical Specification 6.8.1. states, in part, "Written procedures shall be established, implemented and maintained covering the activities referenced below....Surveillance and test activities of safety-related equipment...."

Contrary to the above, it was observed that neither the heatup nor cooldown rates of the Pressurizer and Reactor Coolant System are determined every 30 minutes during heatup or cooldown of these systems. In addition, station operating procedures for operation of the Reactor Coolant System and Pressurizer, while specifying the correct heatup and cooldown rates, do not provide instructions for determining whether these rates are within limits every 30 minutes during heatups or cooldowns.

Discussion Of Infraction

While heatup and cooldown rates were not specifically checked every 30 minutes, strip chart records of the RCS are available to show that limits were not exceeded. It should be noted that the results of start-up testing show that it is not possible to exceed the specified heatup rates.

Corrective Action

Operating Manual Change Notices (OMCNs 79-56, 57, 58 and 60) were issued to ensure monitoring of the RCS and Pressurizer heatup and cooldown rates every 30 minutes.

Action Taken To Prevent Recurrence

The change notices were permanently incorporated into the Operating Manual. These changes should ensure that the 30 minute monitoring is performed and documented.

A. INFRACTION (continued)

Date On Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.

B. DEFICIENCY

Description Of Deficiency (79-14-01)

- Technical Specification 6.8.1 states, in part, "Written procedures shall be established, implemented and maintained covering the activities referenced below....The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November 1972...."
- Appendix A of Regulatory Guide 1.33, November 1972, states, in part, "The following are typical safety-related activities which should be covered by written procedures....Procedure Adherence and Temporary Change Method...."
- BVPS-OM 1.48.3.E.6, On-the-Spot Revisions, states, in part, "...the OMCN may be in effect for 7 days without the additional approval of the BVPS Superintendent (or alternate). After review by the Onsite Safety Committee (OSC) and approval by the BVPS Superintendent...the OMCN may remain in effect an additional 90 days. If the OMCN has not been approved by the Superintendent within 7 days of the effective date, or the revision to the Chapter section has not been issued within 90 days, the change notice will be removed from the controlled copies."

Contrary to the above, the following deficiencies were noted during review of Station operating procedures:

- In six instances, temporary changes which had expired were still posted to control copies of Station operating procedures.
- In one instance, a temporary change was posted to a procedure, however, no change authorization sheet was present. This temporary change had been superseded by a revision which had failed to change that portion of the procedure.
- In two instances, a temporary change was made to procedures without issuance of a temporary change authorization.
- On 77 separate occasions between March 2, 1979 and May 31, 1979, the wrong change to a daily log sheet had been used.
- In one instance, an expired temporary change was posted to an operating procedure although it had been superseded by a Temporary Operating Procedure.

B. DEFICIENCY (continued)

Discussion Of Deficiency

A check of the two instances involving unauthorized handwritten changes to procedures showed that both were corrections of typographical errors, obvious to the operator, and no compromise to safety existed. The errors have since been corrected in a revision to the Operating Manual.

Corrective Action

The controlled copies of the Operating Manual were checked to ensure that all expired or permanently incorporated change notices were removed.

Action Taken To Prevent Recurrence

Whenever a revision to the Operating Manual is issued, the person responsible for changing the controlled copies will be informed by the procedures engineer which OMCNs are to be removed. The procedures engineer will be responsible for ensuring that expired OMCNs are removed from the controlled copies.

Attempts will be made to incorporate changes into the Operating Manual as soon as possible to preclude mistakes on log sheets or procedures.

A memo has been sent to the Shift Supervisors from the Operations Supervisor as a reminder that all changes to a procedure must be properly authorized.

Date On Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.

C. DEFICIENCY

Description Of Deficiency (79-14-03)

Technical Specification 6.9.1.9 states, in part, "The types of events listed below shall be the subject of written reports to the Director of the Regional Office within 30 days of occurrence of the event...." A Reactor Protection System or Engineered Safety Feature instrument settings, which are found to be less conservative than those established by the Technical Specifications but which do not prevent the fulfillment of the functional requirement of affected systems.

Contrary to the above, the failure of one Overtemperature Delta-T, Reactor Trip System instrument channel, which occurred on April 24, 1978, was not reported.

C. DEFICIENCY (continued)

Discussion Of Deficiency

This occurred shortly after the reporting requirements for events were changed. It appears there was some confusion at the time as to this being a reportable occurrence since the action statement was met.

Corrective Action

A report has been issued for the noted occurrence.

Action Taken To Prevent Recurrence

Appropriate Station personnel have been reminded of the proper reporting requirements and assignments have been made regarding responsibilities in initiating the report.

Date On Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.

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