



Duquesne Light

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October 15, 1981

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Attn: R. C. Haynes, Regional Director
Region 1
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. 81-15

Gentlemen:

In response to your letter of September 14, 1981, and in accordance with 10 CFR 2.201, the attached reply addresses the Notice of Violation which was included as Appendix A with the referenced inspection report.

Your letter specifically addressed Item B of Appendix A which identified two examples of firedoors being found open and unattended. You stated that this item was identified during a previous inspection and that our corrective actions were not effective since this item has recurred. You also stated that we should give particular attention to those actions taken or planned to ensure that identified items of noncompliance will be completely corrected and will not recur. We share your concern in this matter and have improved the methods previously established which were designed to prevent recurrence. The details of those improvements are contained in our response in Appendix A.

It has been, and will continue to be, our goal to determine the best method for preventing recurrence of each violation and the full expectation that those corrective actions will be sufficient to prevent recurrence.

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

Very truly yours,

J. J. Carey
Vice President, Nuclear

Attachment

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cc: Mr. D. A. Beckman, Resident Inspector
U. S. Nuclear Regulatory Commission
Beaver Valley Power Station
Shippingport, PA 15077

U. S. Nuclear Regulatory Commission
c/o Document Management Branch
Washington, DC 20555

COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF BEAVER) SS:

On this 15 day of October, 1981, before me, Heidi Martin, a Notary Public in and for said Commonwealth and County, personally appeared J. J. Carey, who being duly sworn, deposed, and said that (1) he is Vice President of Duquesne Light, (2) he is duly authorized to execute and file the foregoing Submittal on behalf of said Company, and (3) the statements set forth in the Submittal are true and correct to the best of his knowledge, information and belief.

Heidi Martin

HEIDI MARTIN, NOTARY PUBLIC
CHIPPEWA TOWNSHIP, BEAVER COUNTY
MY COMMISSION EXPIRES JUNE 10, 1985
Member, Pennsylvania Association of Notaries

DUQUESNE LIGHT COMPANY
Beaver Valley Power Station
Unit No. 1

Reply to Notice of Violation
Appendix A
Inspection No. 81-15
Letter dated September 14, 1981

VIOLATION A (Severity Level V; Supplement I)

Description of Violation (81-15-02)

10 CFR Part 50, Appendix B, Criterion VI, Document Control, states in part: "Measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed"

BVPS Station Administrative Procedures, Chapter 8, Section VI.D.2, Maintenance Surveillance - Execution, references Section VI.B.2, which states in part: "a. It shall be the responsibility of the appropriate Maintenance Engineer to assure that the on-the-job work package contains the appropriate documents and their latest applicable revisions ...b. Copies of procedures required for on-the-job use shall be made from the controlled copy of the procedure and the front page shall be stamped "Approved for Use."

Contrary to the above, Maintenance Surveillance Procedure 43.11, Radiation Process Monitor RM-RW-101, Component Cooling Heat Exchanger River Water Calibration, Revision 1, was partially performed on June 26, 1981, using a controlled copy procedure that had been validated and approved for use during the period only from May 18 to May 23, 1981.

Corrective Action Taken

The calibration of the Radiation Process Monitor, RM-RW-101, was terminated and the channel restored to normal operation promptly upon the discovery that the calibration was being performed after the expiration date of the approved procedure. The Maintenance Surveillance Procedure (MSP) was reviewed against the file copy to determine if any procedure changes had been issued. It was verified that there had been no procedure changes between the dates the MSP was stamped and the date it was partially performed.

Action Taken To Prevent Recurrence

Instrument and Control personnel have been instructed that surveillance procedures can only be performed within the dates specified on the cover sheet stamped "APPROVED FOR USE." Also, if a procedure is out of date, they are to inform their foreman so that he can verify with the procedures group that the procedure is the current approved copy.

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VIOLATION A (Continued)

Date On Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.

VIOLATION B (Severity Level V; Supplement 1)

Description of Violation (81-15-03)

Technical Specification 3.7.15 states: "All penetration fire barriers protecting safety related areas shall be functional. Action: With one or more of the above required penetration fire barriers non-functional, a continuous fire watch on at least one side of the affected penetration shall be established within 1 hour." This requirement is applicable at all times.

Contrary to the above, the fire doors listed below were found open and unattended on the dates indicated without adequate measures either established or implemented to assure that a fire watch was in affect.

- Door between Primary Auxiliary Building (PAB) and "Elevator" Stairwell. 752' Elevation. (June 25, 1981).
- Door between PAB and Safeguards, 722' Elevation. (June 6 and 7, 1981).

Corrective Action Taken

The door between the PAB and the "Elevator" Stairwell was immediately closed. Subsequent inspections and operability tests were successfully performed by the Senior Safety Engineer to verify that the door was operating correctly.

The door between the PAB and Safeguards, 722' Elevation, was examined and it was determined that the heavy duty closure mechanism was not operating properly. This was immediately repaired.

Action Taken To Prevent Recurrence

Periodic tours with log sheets identifying each fire door located in a safety related area are being developed by the station operating organization and the security organization. This is a significant change over existing methods for identifying problems with fire doors. The log sheets will provide a positive means for assuring fire doors are examined. The ongoing fire door maintenance program is still in effect in that identification of doors in need of maintenance and their subsequent repair is being completed expeditiously.

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VIOLATION B (Continued)

Date On Which Full Compliance Will Be Achieved

Full compliance will be achieved by October 30, 1981.

VIOLATION C (Severity Level V; Supplement I)

Description of Violation (81-15-09)

Technical Specification 6.8, Procedures, 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..." Appendix A of Regulatory Guide 1.33, November 1972, recommends, in part, the following procedures: "Section C. Procedures for Startup Operation, and Shutdown of Safety Related PWR Systems ... C.3 Reactor Cleanup System ... and Section G. Procedures for Control of Radioactivity ... G. 1 Liquid Radioactive Waste System ..." DLC Special Operating Order 80-08, Procedure Compliance, identifies, in part, the above procedures, requires strict procedure compliance, and references approved methods for making changes to procedures.

Contrary to the above, on or about June 11, 1981, Boron Recovery System procedures were not properly established, implemented or maintained in that BVPS Operating Manual Section 1.8.4.M, Correcting Major Component Alarm Conditions - Boron Recovery Tank 4A Level HIGH-LOW, Issue 2, Revision 1 was not complied with or revised when Boron Recovery Tank BR-TK-4A was filled above the high level alarm and the top range of instrument indication. In addition, no other procedure subject to 10 CFR 50.59 review was available to operators for controlling the evolution.

Corrective Action Taken

The tank was drained below the alarm point when the required Boron Recovery equipment was repaired and returned to service.

Action Taken To Prevent Recurrence

Operating Supervisors have been instructed, in writing, that safety related equipment should not be operated without written, approved procedures for the particular configuration of the equipment that is being operated. A reference was made to this violation and the personnel actions which permitted it to occur.

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VIOLATION C (Continued)

Date On Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.

VIOLATION D (Severity Level V; Supplement I)

Description of Violation (81-15-05)

Technical Specification 6.8, Procedures, states, in part: "Written procedures shall be maintained covering the activities referenced below: a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, November 1972 ..." Appendix A of Regulatory Guide 1.33, November, 1972, recommends, in part, the following procedures: "C. Procedures for Startup, Operation, and Shutdown of Safety Related PWR Systems ... C.8.b. Special Containment Systems... (2) Subatmospheric."

Contrary to the above, procedures for operation of the containment personnel airlock door were not properly maintained at their location of use. On June 25, 1981, BVPS OM Sections 1.47.4.A, Issue 1, Revision 3, and BVPS OM Section 1.47.4B, Issue 1, Revision 3 were posted on the outer airlock door. The current revision of OM Section 1.47.4 was Issue 2, Revision 1. Additionally, OM Section 1.47.4 was partially superceded by Temporary Operating Procedure (TOP) 81-14 on May 14, 1981. The TOP was not posted on the airlock door; however, a copy of the TOP was available inside the airlock.

Corrective Action Taken

The obsolete procedure was immediately removed from the airlock door.

Action Taken To Prevent Recurrence

Procedures posted at locations in the plant, such as those for the operation of the airlock, have been identified. An administrative procedure has been prepared for the control and maintenance of such procedures.

Date On Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.