



**Duquesne Light**

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Pittsburgh, Pa.  
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November 4, 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. 81-20

Gentlemen:

In response to your letter of October 2, 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.

We have reviewed the referenced inspection report for 10 CFR 2.790 information and none was identified.

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

Very truly yours,

J. J. Carey  
Vice President, Nuclear

Attachment

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

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COMMONWEALTH OF PENNSYLVANIA)  
COUNTY OF BEAVER ) SS:

On this 7th day of November, 1981, before me, Shula M. Fattore, 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.

Shula M. Fattore

SHEILA M. FATTORE, NOTARY PUBLIC  
SHIPBOARD BOARD BEAVER COUNTY  
MY COMMISSION EXPIRES SEPT. 26, 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. 81-20  
Letter dated October 2, 1981

VIOLATION A (Severity Level IV; Supplement I)

Description of Violation (81-20-01)

10 CFR 50.72 (a) (7), Notification of Significant Events, states, "Each licensee of a nuclear power reactor licensed under 50.21 and 50.22 of this part shall notify the NRC Operations Center as soon as possible and in all cases within one hour by telephone of the occurrence of any of the following significant events and shall identify the event as being reported pursuant to this section: ...(7) Any event resulting in manual or automatic actuation of Engineered Safety Features, including the Reactor Protection System..."

The BVPS Operating Manual, Section 1.48.9.D.1.c, Prompt Notification, Issue 1, Revision 12, states, in part, "The NRC shall be notified immediately (not to exceed 1 hour) of any significant events at operating nuclear power plants. Notification will be given directly to I&E Headquarters by way of the NRC Hotline... It is considered that the following significant events are examples requiring NRC notification: ...(7) Any event resulting in manual or automatic actuation of Engineered Safety Features, including the Reactor Protection System..."

Contrary to the above, on August 27, 1981, automatic actuation of the Reactor Protection System was not reported within one hour in that:

- At 4:40 p.m., August 27, 1981, Low-Low Level in the "C" Steam Generator actuated an automatic Reactor Protection System reactor trip;
- The event was not reported to the NRC Operations Center by the licensee within one hour; and
- Notification to NRC Region I was made by the resident inspector on August 28, 1981.

Corrective Action Taken

The Resident Inspector identified to the Station Operating Supervisor that this event was reportable to the NRC Operations Center. Because of the significant time delay and since the purpose of prompt identification was to inform the NRC Operations Center within one hour following a Reactor Trip, the Resident Inspector informed the Station Operating Supervisor that a late notification would not be necessary. No immediate corrective action was considered necessary and none was taken.

Action Taken To Prevent Recurrence

The reporting requirements of 10 CFR 50.72 and a similar example of a failure to notify the NRC Operations Center is included in the Licensed Operator Retraining Program. The Module containing this information is being conducted at this time.

VIOLATION A (Continued)

Date On Which Full Compliance Will Be Achieved

Full compliance will be achieved by December 31, 1981.

VIOLATION B (Severity Level V, Supplement I)

Description of Violation (81-20-05)

Technical Specification (TS) 6.8.1.c, Procedures, states, "Written procedures shall be established, implemented and maintained covering the activities referenced below: ...c. Surveillance and test activities of safety related equipment..." Technical Specification 3/4.3.3.7 requires three independent control room chlorine detection systems to be operable in Modes 1, 2, 3, and 4, and provides requirements for performance of a monthly Channel Functional Test.

Operating Surveillance Test (OST) 1.44A.6 was improperly implemented and maintained during the period July 22 - August 20, 1981 in that:

- The above requirement was established as part of Revision 10 to OST 1.44A.6 prior to July 22, 1981 performance of the procedure;
- OST 1.44A.6, Revision 10 was subsequently performed on July 22, August 5, August 13, and August 19, 1981;
- During those performances, the chlorine detector reservoir makeup frequency was only entered on shift turnover sheets on one occasion (NSS turnover sheet, 1500-2300 shift, August 19, 1981).
- Equivalent entries were, however, made in the NSS, NSOF, and NCO narrative logs for seven of the nine required cases;
- None of the turnover sheets or narrative log entries were carried over onto the turnover sheets of logs of subsequent shifts;
- Step 3 of the OST was signed by each of the individuals required to make the turnover sheet entries signifying completion of the required steps; and
- No revisions or annotations were made to OST 1.44A.6, Revision 10, to reflect the alternative logging methods in use.

Corrective Action Taken

As a result of this event, an Operating Manual Change Notice was issued deleting the requirements to log entries in the various shift turnover sheets and substituting a requirement to utilize the status board to monitor the surveillance of this system.

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VIOLATION B (Continued)

Action Taken To Prevent Recurrence

The Station Operating Supervisor has discussed the incident with the responsible individuals and, in addition, is assembling training information related to this occurrence to be presented to all operating personnel. The requirements to personally verify that an activity is complete prior to signing off will be presented to all operating personnel by the end of this month.

Date Full Compliance Will Be Achieved

Full compliance will be achieved by November 30, 1981.