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HARRISBURG

November 10, 1981

Dr. Nunzio Palladino  
Chairman  
Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Dr. Palladino:

I am writing in reference to the Beaver Valley I nuclear power plant in Shippingport, Pennsylvania, and certain news articles and reports, one of which was prepared by the Nuclear Regulatory Commission, which raise serious allegations about the operations of this plant. This letter also deals with Duquesne Light's response to these allegations.

Through various news accounts, I learned that an NRC survey comparing the performance of the country's operating nuclear power plants rated the Beaver Valley I unit as "below average." Moreover, according to the news articles, it was the most heavily cited of all the plants surveyed for weaknesses in nine of the fifteen functions considered in the appraisal.

Based on this information, I wrote to John M. Arthur, Chairman of the Board of Duquesne Light, asking for his comments. In his response (see enclosure), Mr. Arthur indicated that the media misinterpreted this report and that the report does not reveal safety problems at the plant. He also stated that the report "was designed to provide utilities operating nuclear facilities with an indication of how well their performance compares to the high levels of excellence established for the nuclear industry."

I would like to know if you concur with Mr. Arthur's interpretation of the Commission report and whether the subsequent attempts outlined in Mr. Arthur's letter that Duquesne Light made to improve its plant's performance were sufficient.



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The second issue that I raised in my letter to Mr. Arthur concerned a document prepared by the Critical Mass Energy Projects entitled "Nuclear Power Plant Safety Scoreboard 1980: 3,800+ Mishaps." This report stated that the Beaver Valley plant reported 102 incidents of equipment problems, flaws in design and human errors in 1980, the ninth highest total among operating nuclear reactors. Also, the report claimed that Beaver Valley was "on-line" only 6.8% of the time.

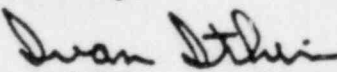
In his response to this issue, Mr. Arthur maintained that the Critical Mass group misrepresented the required reporting procedures as established by the NRC for nuclear facilities. I would like to know if you agree with this assessment or whether the NRC is concerned with the number of incidents reported by Duquesne Light during 1980.

Responding to the poor on-line performance rating, Mr. Arthur noted that the plant was out of service for most of 1980 for refueling and for modifications to the piping support system. The latter, according to Mr. Arthur, was mandated by the NRC. Please advise me if this is accurate.

Finally, the last issue that I raised with Mr. Arthur concerned a February 1, 1982 deadline established by the NRC for installation of emergency warning systems. According to Mr. Arthur, barring the continued unavailability of equipment, they will comply with this deadline. Please inform me if this confirms with Commission data on this subject.

Your response to this letter will be appreciated. Thank you.

Sincerely,

  
Ivan Itkin

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JOHN M. ARTHUR  
Chairman of the Board and  
Chief Executive Officer

September 30, 1981

The Honorable Ivan Itkin  
House of Representatives  
Commonwealth of Pennsylvania  
Box 174  
Harrisburg, Pennsylvania 17120

Dear Representative Itkin:

This is in response to your September 16 letter in which you expressed concern about our Beaver Valley Power Station because of a 1979-80 Nuclear Regulatory Commission (NRC) survey which was recently the subject of an article in the New York Times and subsequent follow-up by the local media.

I am very much concerned about the apparent erroneous interpretation that the media has made regarding the NRC report and must assure you that in no way does this report give evidence of safety problems at BVPS. The report was designed to provide utilities operating nuclear facilities with an indication of how well their performance compares to the high levels of excellence established for the nuclear industry. When the NRC made its review of Beaver Valley Unit No. 1, about one year ago, we were told that the unit was classified as having satisfactory performance in ten areas including licensed operator training, refueling operations, radiation protection, environmental protection, emergency preparedness, radioactive waste management, and waste transportation.

In those areas where Beaver Valley Unit No. 1 was classified as needing additional strength, we have taken steps to improve our performance and the NRC was so informed. For example, we have added to our security and fire protection equipment and we are increasing our staff and work force. The recently created separate Nuclear Division provides a positive response to those areas indicated by the report as needing additional strength.

The second concern mentioned in your letter pertained to a Critical Mass Energy Project report and the extended outage of Beaver Valley Unit No. 1 during 1980.

The document prepared by the Critical Mass group is a misrepresentation of the required reporting procedures established by the NRC for nuclear facilities. The 102 "incidents" referred to in the document are called Licensee Event Reports (LER's), and are filed by the operating company of a nuclear facility for each "incident" occurring at the site, many of which are expected in the daily routine operation of the plant. Realizing this and the fact that Duquesne Light Company personnel assume a very conservative approach to the reporting procedures, we were not surprised by the number of LER's filed last year. The number of LER's filed has no correlation to plant safety or operations, but do serve as an effective communications tool between the nuclear facility operator and the NRC as we both strive to further improve the operating performance at nuclear plants.

Beaver Valley Power Station was out of service for most of 1980 for refueling and for modifications to the piping support systems. This outage was not the result of poor operations or the lack of effective management, and in particular, was not related to the number of LER's previously mentioned. The piping support system modifications were mandated by the NRC for reasons which included post-TMI modifications, commitments to the NRC made during the plant's licensing stage for upgrading the safety posture of the plant to even higher standards, and modifications due to generic design deficiencies. The Beaver Valley Power Station modifications were not unique because all nuclear facilities in the U.S. are required to meet established standards in order to maintain their operating license.

Finally, in regard to the emergency warning sirens, approximately 35 of the large 106 pole-mounted sirens required for the Beaver Valley Emergency Warning System have been installed to date, with the remaining 71 large sirens scheduled to be operational by February 1, 1982. The installation of the 1400 mini-sirens, to be located at individual homes outside the audible range of the pole-mounted sirens, will begin during November, 1981. We are currently experiencing difficulty in obtaining some of the necessary equipment for the mini-sirens, as are other nuclear power station operators, because of delays in the manufacturer's design work, and the availability of the equipment due to the large number of sirens on order by U.S. nuclear facilities. Barring the continued unavailability of equipment, it is our intent to fully comply with the February 1, 1982 NRC deadline.

Even with the problem of equipment availability, we feel we now can meet the intent of the NRC requirements to notify 90 percent



September 30, 1981

of the public within the Emergency Preparedness Zone within a 15-minute period. In addition, with a concerted effort which would involve the emergency management agencies, the civil defense, local police and fire departments, etc., we could also manage to notify the remaining 10 percent of the public within the NRC required 45-minute period.

Sincerely yours,

