

Duquesne Light Company

Beaver Valley Power Station
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(412) 393-5206
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April 30, 1993

GEORGE S. THOMAS
Division Vice President
Nuclear Services
Nuclear Power Division

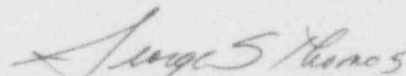
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66
Inspection Report 50-334/93-01

In response to NRC correspondence dated March 26, 1993, and in accordance with 10 CFR 2.201, the attached reply addresses the Notice of Violation transmitted with the subject inspection report.

If there are any questions concerning this response, please contact Mr. K. L. Ostrowski at (412) 393-5104.

Sincerely,


G. S. Thomas

Attachment

cc: Mr. L. W. Rossbach, Sr. Resident Inspector
Mr. T. T. Martin, NRC Region I Administrator
Mr. W. J. Lazarus, Chief, Reactor Projects Section No. 3B
Division of Reactor Projects, Region I
Mr. G. E. Edison, Project Manager
Mr. M. L. Bowling (VEPCO)

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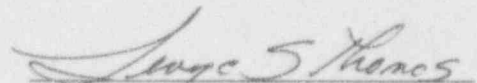
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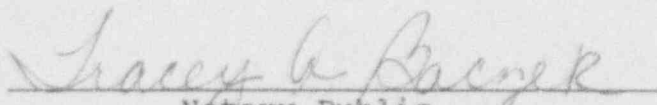
COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF BEAVER) SS:
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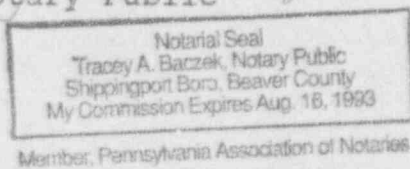
Subject: Beaver Valley Power Station, Unit No. 1
BV-1 Docket No. 50-334, License No. DPR-66
Inspection Report 50-334/93-01

Before me, the undersigned notary public, in and for the County and Commonwealth aforesaid, this day personally appeared George S. Thomas, to me known, who being duly sworn according to law, deposes and says that he is Division Vice President, Nuclear Services of the Nuclear Power Division, Duquesne Light Company, he is duly authorized to execute and file the foregoing submittal on behalf of said Company, and the statements set forth in the submittal are true and correct to the best of his knowledge, information and belief.


George S. Thomas

Subscribed and sworn to before me
on this 30th day of April, 1993


Notary Public



DUQUESNE LIGHT COMPANY
Nuclear Power Division
Beaver Valley Power Station, Unit No. 1

Reply to Notice of Violation

Combined Inspection Report 50-334/93-01 and 50-412/93-01
Letter dated March 26, 1993

VIOLATION (Severity Level IV; Supplement I)

Description of Violation (50-334/93-01-01)

Technical Specification 6.8.1.9 requires that written procedures be established, implemented and maintained, covering activities listed in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Operating Manual procedure 1.18.4.A, "Flushing Resin from any Group I Ion Exchanger," Issue 2, Revision 34, specifies that if the level change in the resin waste hold tank (1SW-TK-2), as indicated by level instrument LI-1SW-202, does not agree with the initial resin volume, then the resin transfer shall be repeated.

Contrary to the above, on January 21, 1993, operators flushed resin from deborating demineralizer 1CH-I-3A to the resin waste hold tank with an identified out-of-service resin waste hold tank level instrument (LI-1SW-202) and were unable to verify the level change in the resin waste hold tank.

Reason for the Violation:

The operators failed to properly implement procedure OM 1.18.4.A, "Flushing Resin From Any Group I Ion Exchanger to [1SW-TK-2]" by performing a resin flush with LI-1SW-202 out-of-service. The operators inappropriately relied on experience with previous resin flushes, by observing pump discharge pressure, to complete the evolution.

Corrective Action Taken:

The operators involved with the event were counseled on the need for procedure compliance.

The Unit 1 Operating Manual, Chapter 18 "Solid Waste Disposal System," Section 4 Operating Procedures were reviewed, revised where appropriate, walked down, and reissued on April 16, 1993. These procedures now refer to the use of the digital indication on LIS-1SW-202 to determine the level in the resin waste hold tank 1SW-TK-2.

Maintenance Work Request No. 018321 was initiated on March 3, 1993, to have the malfunctioning analog meter LI-1SW-202 permanently removed from service.

Action Taken to Prevent Recurrence:

The operations personnel involved with solid waste processing attended the refresher training module "Beaver Valley Site Procedure Compliance," to re-emphasize the importance of strict procedure compliance.

A Human Performance Enhancement System evaluation was completed on the activities which resulted in this violation.

The circumstances surrounding this violation will be reviewed in the Solid Waste/Process Control Program Module of the Radioactive Waste Shipping and Handling Retraining Course with emphasis on procedure compliance.

Date of Full Compliance:

The station is in full compliance at this time.

The Radioactive Waste Shipping and Handling Retraining Course will be completed by December 15, 1993.