



Duquesne Light

Nuclear Division
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June 9, 1982

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Attn: Richard W. Starostecki, Director
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. 82-08

Gentlemen:

In response to your letter of May 11, 1982, 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. The violation cited involved a missed surveillance test. Since this item is somewhat similar to other recent violations, additional attention was given to our actions taken 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

cc: Mr. W. M. Troskoski, 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

DUQUESNE LIGHT COMPANY
Beaver Valley Power Station

Reply to Notice of Violation
Inspection No. 82-08
Letter dated May 11, 1982

VIOLATION (Severity Level V; Supplement I)

Description of Violation (82-08-01)

Amendment 18 to Facility License DPR-66, issued June 6, 1979, requires implementation of an Operations Quality Assurance Plan for fire protection activities, including testing and administrative controls. The BVPS Operations Quality Assurance Plan, Appendix C, Fire Protection, Revision 1, requires that inspections and testing of the Fire Protection Systems be accomplished in accordance with documented instructions and procedures. The BVPS Operating Manual (OM) Section 1.55A, Periodic Checks and Operating Surveillance, Operating Surveillance Test (OST) 1.33.15, Fire Extinguisher Inspection, Issue 1, Revision 35, establishes monthly inspections of portable fire equipment in accordance with National Fire Protection Association Pamphlet 10. OM Section 1.55A.1, Summary Description, Issue 1, Revision 1, defines monthly test frequency as at least once per 31 days with a maximum allowable extension not to exceed 25% of the surveillance interval.

Contrary to the above, on April 15, 1982, OST 1.33.15 had not been performed since February 22, 1982, exceeding the maximum permissible interval.

Corrective Action

The required surveillance was performed on April 17, 1982.

Action Taken to Prevent Recurrence

The Shift Technical Advisors have been assigned to check OST Schedule to assure all items are started and completed as scheduled.

In addition, in order to highlight the commitment to perform this surveillance, the OST cover sheet has been modified to indicate that this test is required by Amendment 18 of the Facility License. Previously, the Technical Specifications Reference block on the cover sheet had been blank since this test was not associated with any specific Technical Specification.

Date on Which Full Compliance Will Be Achieved

Full compliance has been achieved at this time.

COMMONWEALTH OF PENNSYLVANIA)

COUNTY OF BEAVER

SS:

On this 9th day of June, 1982, before me, Sheila 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.

Sheila M. Fattore

SHEILA M. FATTORE, NOTARY PUBLIC
SHIPPINGPORT BORO, BEAVER COUNTY
MY COMMISSION EXPIRES SEPT. 16, 1985
Member, Pennsylvania Association of Notaries