Duquesne Light

Nuclear Division
P.O. Box 4
Shippingport, PA 15077-0004

Telephone (412) 456-6000

December 29, 1982

U. S. Nuclear Regulatory Commission
Office of Inspection & Enforcement
Attn: Mr. R. W. Starostecki, Director
Division of Project & Resident Programs
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. 82-25

Gentlemen:

In response to your letter of August 30, 1982, and in accordance with 10 CFR 2.201, the attached reply addresses Notice of Violation A and B which was included as Appendix A with the referenced Inspection Report.

As discussed with the Resident Inspector on December 29, 1982, we will supply a response to Violation C on or before January 10, 1983.

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

Very truly yours,

J. D. Sieber
for 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
Unit No. 1

Reply to Notice of Violation
Inspection 82-25
Letter dated November 30, 1982

VIOLATION A

Description of Violation (82-25-02)

Technical Specification 6.8.1 and Appendix A of Regulatory Guide 1.33, November 1972 requires the implementation of administrative procedures concerning procedure adherence. BVPS OM 1.48.3, Section G, Adherence to Operating Procedures, requires adherence to operating procedures except in instances that do not affect the nuclear safety of the plant and the overall operation of the system or plant is not jeopardized. BVPS OM 1.8.4 requires that primary water supply pumps be aligned so that suction and recirculation is to the same tank when supplying the makeup header.

Contrary to the above, on October 18, 1982, there was a lack of adherence to an operating procedure that affected plant nuclear safety and resulted in the overall operation of the primary water supply system being jeopardized as evidenced by the loss of makeup header pressure leading to difficulty in maintaining pressurizer level and subsequent letdown system isolation on low pressurizer level. This loss of makeup header pressure resulted from altering primary water supply pump alignment so that suction and recirculation were not from the same tank when supplying the makeup header in that suction was taken from tank BR-TK-6B with recirculation to tank BR-TK-6A.

Corrective Action Taken

The primary water supply pump suction and recirculation were aligned to the same tank.

Action Taken to Prevent Recurrence

Our investigation has determined that the root cause of this event was poor communication between operators due to the large number of operations required to bring the plant to the proper condition during the incident. The Operations Supervisor has discussed the events and proper actions with the operators involved and this item has been included for all operators in License Retraining, Module II.

Our investigation has also determined that incorrect calibration of the level alarms on BR-TK-6A and 6B prevented immediate detection and correction of the valving error by preventing receipt of the high level alarm prior to overflow. The level alarms for BR-TK-6A and 6B have been recalibrated to prevent recurrence of this problem.

Date Upon Which Full Compliance Will be Achieved

The corrective actions discussed above have been completed.

VIOLATION B

Description of Violation (82-25-03)

Technical Specification 6.8.2 requires that operating procedures be reviewed by the OSC and approved by the Plant Superintendent.

Contrary to the above, as of October 25, 1982, the control room tank curve book, in effect a part of operating procedures in that curves from that book are required to be used by operators in such computations as liquid waste discharge volumes per procedure O.M. 1.17.4 and boric acid inventory per procedure O.S.T 1.7.8, had not been reviewed by the OSC and approved by the Plant Superintendent.

Corrective Action Taken

We have reviewed the accuracy of tank curves for tanks used for liquid discharges or surveillance testing. The following curves have been reviewed:

CH-TK-2	Volume Control Tank
DG-TK-1, 2	Primary Drain Transfer Tanks
BR-TK-4A, 4B	Coolant Recovery Tanks
WT-TK-10	Primary Plant Demineralized Water Storage Tank
LW-TK-5A, 5B	Evaporator Test Tanks
LW-TK-3A, 3B	Low-Level Waste Drain Tanks
QS-TK-1	Refueling Water Storage Tanks
RC-TK-2	Pressurizer Relief Tank
BR-TK-2A, 2B	Test Tanks
LW-TK-6A, 6B	Laundry and Contaminated Shower Drain Tanks
LW-TK-7A, 7B	Steam Generator Drain Tanks
BR-TK-6A, 6B	Primary Water Storage Tanks

Action Taken to Prevent Recurrence

The entire curve book will be submitted to the OSC for review and then forwarded to the Station Superintendent for approval.

In the future, the tank curves will be controlled under O.M. Chapter 48, Section 9, Procedure "M", "Revisions to Operating Group Valve Operating Number Drawings".

Date on Which Full Compliance Will be Achieved

The control room tank curve book will be approved by January 31, 1983.