



Duquesne Light

Nuclear Division
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January 10, 1983

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

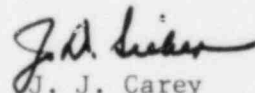
Gentlemen:

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

A reply to Violations A and B was submitted in our letter to you dated December 29, 1982. As previously discussed with the Resident Inspector, we are providing a response to Violation C at this later date.

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

Very truly yours,


J. J. Carey
for 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 C (Severity Level IV; Supplement I)

Description of Violation (82-25-05)

Technical Specification 6.8.1 and Appendix A to Regulatory Guide 1.33, November 1972 requires procedures to be established and implemented for the control of radioactivity. BVPS Radcon Manual Procedure RP 8.1 requires that a Radiological Work Permit (RWP) be used for work in a radiologically controlled area where significant radiation or contamination is present or is likely to result during the work.

Contrary to the above, on October 20, 1982, a RWP was not used for work involving back flushing the Cation Bed Ion-Exchanger with primary coolant to the PAB sump in a radiologically controlled area. This work involved significant radiation and contamination as evidenced by the resultant high airborne activity and personnel contamination.

Corrective Action Taken

The backflush operation was terminated. Portable Continuous Air Monitors in the area and the installed leak collection monitor (RM-105) went into alarm. Radiation Technicians evacuated personnel from the area. Personnel surveys for skin contamination showed short lived skin contamination. Subsequent surveys showed that the activity had decayed to less than minimum detectable activity.

Action Taken to Prevent Recurrence

The Operating Procedure for performing demineralizer flushing is being revised to prevent a similar event from recurring during this operation.

To address the root cause of events of this type, the following additional steps have been or will be taken:

1. Operating Manual Chapter 48 will be revised to require notification to Radcon Operations prior to the performance of operating evolutions which may significantly affect radiological conditions.
2. Chemistry Manual Chapter 3 will be revised to require notification to Radcon Operations prior to the performance of chemistry activities which may significantly affect radiological conditions.

3. The Radiological Operations shift turnover record has been revised to require the Radcon shift foreman to contact Operations to determine if any evolutions are planned during the shift which may have radiological impact.
4. The Station Superintendent has given written notification to all Operations, Chemistry and Radcon personnel which discussed the evolution that led to the violation, stating the requirements for use of the RWP and RACP and informing personnel of planned manual changes which are to prevent recurrence.
5. Radiological Operations personnel will be instructed in the incident and its consequences, and Radcon responsibilities to prevent recurrence.

Date on Which Full Compliance Will be Achieved

Procedure revisions will be completed by February 28, 1983.

Training will be completed by April 30, 1983.