

Duquesne Light Company

Beaver Valley Power Station
P.O. Box 4
Shippingport, PA 15077-0004
(412) 393-5206
(412) 643-8069 FAX

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

August 10, 1994

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

Subject: Beaver Valley Power Station, Unit No. 1 and No. 2
BV-1 Docket No. 50-334, License No. DPR-66
BV-2 Docket No. 50-412, License No. NPF-73
Combined Inspection Report 50-334/94-14 and 50-412/94-14
Reply to Notice of Violation

In response to NRC correspondence dated July 13, 1994, 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. N. R. Tonet at (412) 393-5210.

Sincerely,


George S. Thomas

Attachment

cc: Mr. L. W. Rossbach, Sr. Resident Inspector
Mr. T. T. Martin, NRC Region I Administrator
Mr. G. E. Edison, Project Manager
Mr. J. C. Linville, Chief, Projects Branch No. 3
Division of Reactor Projects, Region I

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9408160330 940810
PDR ADOCK 05000334
G PDR

LEO
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bcc: ORC Members
AIS Members
M. L. Bowling (VEPCO)
L. R. Freeland
T. P. Noonan
K. D. Grada
N. R. Tonet
K. L. Ostrowski
Central File (2), ND3NSM:6628

F. D. Schuster
A. M. Dulick
A. H. Brunner
F. J. Schaffner
T. M. McGhee
E. Chatfield
R. E. Duckworth
R. F. Balcerek
B. Tuite
A. J. Fenwick

References:

ND3MNO:3600

Commitments:

1. Continue to perform monthly self assessments of the Operator Aid process until long term actions are fully implemented.
Responsibility: Procedures Due Date: 3/31/95
2. Revise the Operator Aid listings for both units to allow the BVRC to distribute Operator Aids using DCS and to incorporate human factor considerations.
Responsibility: Procedures Due Date: 9/1/94
3. Revise OST 1/2.48.12 to be more compatible with the revised Operator Aid listing and to require that a problem report be written when an Operator Aid is found out of date.
Responsibility: Procedures Due Date: 9/1/94
4. Have a procedure engineer initially perform OST 1/2.48.12 for both units to validate the new format and correct any deficiencies found.
Responsibility: Procedures Due Date: 9/7/94 - BV-2
9/15/94 - BV-1
5. Provide the final validated Operator Aid listing to BVRC.
Responsibility: Procedures Due Date: 10/1/94
6. Complete conversion of the Operator Aid distribution process into the DCS.
Responsibility: Records Management Due Date: 1/31/95
7. Complete a self assessment of the Operator Aid distribution process using DCS.
Responsibility: Procedures Due Date: 3/31/95

DUQUESNE LIGHT COMPANY
Nuclear Power Division
Beaver Valley Power Station

Reply to Notice of Violation

Combined Inspection Report 50-334/94-14 and 50-412/94-14
Letter dated July 13, 1994

VIOLATION (Severity Level IV, Supplement I)

Description of Violation (50-334/94-14-01 and 50-412/94-14-01)

10 CFR 50, Appendix B, Criterion VI, Document Control, requires measures be established to control the issuance of documents, such as instructions and procedures, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed.

Beaver Valley Power Station Nuclear Power Division Directive 1.6.1, "Document Control Program," states that a document control program be established and provide a distribution system which ensures documents are issued to the individuals or groups performing the prescribed activity and provides a means for ensuring subsequent revisions are issued to those recipients and that the superseded documents are properly dispositioned.

Contrary to the above, between April 1 and June 23, 1994, the licensee failed to establish adequate document controls for ensuring revisions to thirty-four operator aid procedures were issued to those operations personnel at the prescribed locations for Units 1 and 2 and that the superseded operator aid procedures were not properly dispositioned.

Reason for the Violation

After a new procedure distribution process was implemented on April 1, 1994, Procedure Engineers were required to individually identify a procedure as an Operator Aid on the distribution request form. However, this requirement was not adequately communicated to the Procedure Engineers, and as a result, some Operator Aids were not identified and properly distributed during the period of April 1 through June 23, 1994.

Corrective Actions Taken

1. All documents distributed through the Document Control System (DCS) since April 1, 1994, were reviewed to assess which Operator Aids were not current, and any discrepancies were corrected.

Corrective Actions Taken (Continued)

2. Specific written guidelines have been provided to each Operations Procedure Engineer/Writer defining his responsibilities to identify Operator Aids during the distribution request generation.
3. Operations Procedure Engineers/Writers were notified to route all Document Distribution Requests through the Operations Procedures Supervisor in order to provide an independent review in identification of Operator Aids.
4. A review of the Operator Aids process to identify other possible problem areas and to develop actions to prevent recurrence was performed.

Actions Taken to Prevent Recurrence

1. Monthly self-assessments are being performed to verify the proper distribution of Operator Aids until long term actions described in Item 5 are fully implemented.
2. The list currently used to identify which documents are to be distributed as Operator Aids will be restructured to allow the Beaver Valley Records Center (BVRC) to distribute Operator Aids using the DCS and to incorporate human factor considerations.
3. The quarterly surveillance of Operator Aids for both units, Operations Surveillance Test (OST) 1/2.48.12, will be revised to be more compatible with the revised Operator Aids listing. In addition, this OST will require that a problem report be written whenever an Operator Aid is found to be out of date.
4. Following approval of the new Operator Aids listings and the revised Operator Aids surveillance, an Operations Procedure Engineer will initially perform OST 1/2.48.12 for both units to validate the new format, remove any Operator Aids not identified on the revised listing, and correct any deficiencies found.
5. The newly validated Operator Aids listing will be entered into the automated DCS. After the completion of the conversion to the automated DCS, distribution of Operator Aids will be controlled through the BVRC.

Date When Full Compliance Will Be Achieved

Presently, Operator Aid distribution requirements are being met. All newly distributed Operator Aids are being identified by the Operations Procedure Engineer/Writer, and independently verified by the Operations Procedure Supervisor. This process will continue until the long term actions identified in Item 5 are completed.

Date When Full Compliance Will Be Achieved (Continued)

Monthly self-assessments are being performed on the Operator Aid process and will continue during the interim period until the long term actions are fully implemented.

The Operator Aids listing for both units will be revised by September 1, 1994.

Operations Surveillance Test 1/2.48.12 will be revised and approved for use by September 1, 1994.

The initial performance of OST 1/2.48.12 will be completed by September 7, 1994 for Unit 2, and September 15, 1994 for Unit 1.

The final validated Operator Aids listing will be entered into the DCS and conversion to the new automated system of Operator Aids distribution will be completed by January 31, 1995. A self-assessment of this new process will be completed by March 31, 1995.