



Duquesne Light

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

Telephone (412) 393-6000

September 22, 1994

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

Subject: Beaver Valley Power Station, Unit No. 2
BV-2 Docket No. 50-412, License No. NPF-73
Combined Inspection Report 50-334/94-17 and 50-412/94-17
Reply to Notice of Violation

In response to NRC correspondence dated August 17, 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,

T. P. Noonan
Division Vice President
Nuclear Operations

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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DUQUESNE LIGHT COMPANY
Nuclear Power Division
Beaver Valley Power Station, Unit No. 2

Reply to Notice of Violation

Combined Inspection Report 50-334/94-17 and 50-412/94-17
Letter dated August 17, 1994

VIOLATION (Severity Level IV, Supplement I)

Description of Violation (50-412/94-17-03)

10 CFR 50, Appendix B, Criterion III (Design Control) requires, in part, that measures be established to assure that applicable regulatory requirements and design bases for those structures, systems, and components to which the appendix applies are correctly translated into specifications, drawings and instructions. Section 7.8 of the Duquesne Light Company Nuclear Power Division Administrative Manual (NPDAP), "Station Modification Control," defines the requirements and responsibilities for physical or functional changes to Beaver Valley Power Station structures, systems and components.

Contrary to the above, in April 1991, the Duquesne Light Company isolated service water flow from the Unit 2 rod control/cable vault area room coolers without appropriate design control measures, and without following appropriate design control procedures. Specifically:

(1) The calculation used to justify removal of service water from the rod control/cable vault room coolers, performed in late 1990, used superseded design information. The calculation justified removal of service water from the coolers by taking credit for the cooling effect of air flow from the supplemental leak collection and release system (SLCRS). The SLCRS air balance was changed in 1988 to reduce the differential pressure across the doors to the containment contiguous areas. The rod control/cable vault areas were left with a total minimum air flow rate of 1110 cubic feet per minute (cfm). The pre-1988 minimum air flow rate was 15,000 cfm. The calculation used the 15,000 cfm rate vice the 1110 cfm rate. If the 1110 cfm rate had been used in the calculation, it would not have supported removal of service water flow from the coolers.

(2) Service water was isolated from the rod control/cable vault room coolers, negating their cooling function following a loss of offsite power, without submitting a Station Modification Request, as required by NPDAP Section 7.8. Since a Station Modification Request was not initiated, the design change was implemented without appropriate review and approval, and several baseline configuration documents were not updated to reflect the change. The documents which were not updated included: the service water system design basis document (DBD-30), the service water system flow diagrams, Chapter 30 of the Operating Manual, and Sections 6.5.3.2, 9.2.1, 9.4.12, and Appendix 9.5A of the Updated Final Safety Analysis Report.

Discussion of Violation

The violation described above states, in part, that service water was isolated from the cooling units without submittal of a Station Modification Request (SMR). While proper design control procedures were not fully implemented for the change in cooling function to SLCRS, it should be noted that our procedures do not require an SMR to be initiated for a change to a valve's normal system alignment.

Reasons for the Violation

The use of superseded design information was caused by personnel error. In addition, the personnel involved with this event did not recognize that the design function of SLCRS was being changed and therefore did not implement the appropriate design control procedures. As a result, not all of the appropriate documents were updated to reflect this change.

Corrective Actions Taken

1. A re-analysis of the loss of off-site power electrical loads for the rod control/cable vault areas was performed and it was determined that the as found SLCRS flow rates were sufficient to keep the cable vault areas below the environmental qualification temperature limit.
2. A Technical Evaluation Report (TER-8810) has been initiated to evaluate the design document discrepancies. Based on this evaluation, the appropriate sections of the UFSAR, Operating Manual, Design Basis Documents and flow diagrams will be updated to fully reflect the current systems' functions.

Actions Taken to Prevent Recurrence

1. A root cause analysis of the event was performed by the Independent Safety Evaluation Group.
2. The site administrative procedure for 10 CFR 50.59 evaluations was revised to remind preparers to initiate a UFSAR update when changes are made to a system, structure, component or procedure which is described in the UFSAR.
3. The Vond Deficiency Report (VDR) form now in use includes the question "Does this change affect a UFSAR figure?" A similar statement is being added to the Operating Manual Change Notice form.
4. Discussion of this event will be included in Engineering Support Personnel training and 10 CFR 50.59 training. The training will place emphasis on thorough reviews, communication, and attention to detail when implementing changes to the plant.

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Date When Full Compliance Will Be Achieved

1. The TER-8810 evaluation will be completed and revision requests for the appropriate documents will be initiated by November 15, 1994. Required document revisions will be tracked for timely implementation.
2. The Operating Manual Change Notice form will be revised by October 31, 1994.
3. This event will be included in Module 94-3 of Engineering Support Personnel training which will be completed by October 15, 1994.
4. Discussion of this event will be included in the annual 10 CFR 50.59 training module in 1995.