

# Duquesne Light Company

Beaver Valley Power Station  
PO Box 4  
Shippingport, PA 15077-0004

August 26, 1991

JOHN D. SIEBER  
Vice President, Nuclear Group

(412) 393-5255

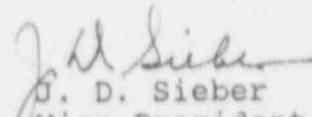
U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

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 50-334/91-14 and 50-412/91-14

In response to NRC correspondence dated July 29, 1991 and in accordance with 10 CFR 2.201, the attached reply addresses the Notice of Violation transmitted with the referenced inspection report.

If there are any questions concerning this response, please contact Mr. F. D. Schuster at (412) 393-5111.

Sincerely,

  
J. D. Sieber  
Vice President  
Nuclear Group

## Attachment

cc: Mr. J. Beall, Sr. Resident Inspector  
Mr. T. T. Martin, NRC Region I Administrator  
Mr. C. W. Henl, Director, Division of Reactor Projects  
Mr. E. C. Wenzinger, Chief, Reactor Projects Branch No. 4,  
Division of Reactor Projects, Region I  
Mr. A. W. DeAgazio, Project Manager  
Mr. M. L. Bowling (VEPCO)

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DUQUESNE LIGHT COMPANY  
Nuclear Group  
Beaver Valley Power Station Units 1 and 2

Reply to Notice of Violation

Combined NRC Inspection 50-334/91-14 and 50-412/91-14  
Letter dated July 29, 1991

Violation (Severity Level IV, Supplement I-D)

Description of Violation (50-412/91-14-03)

Technical Specification 6.8.1.C requires that written procedures be established, implemented and maintained covering surveillance and test activities of safety related equipment.

Contrary to the above, surveillance procedures were not established to cover operation of both Unit 2 diesel generators with the following safety related components:

- 1) Valve 2EGO-115, strainer 2EGO\*STR24A, and valve 2EGO-117 which constituted the alternate lube oil flow path for the 2-1 EDG.
- 2) Valve 2EGO-114, strainer 2EGO\*STR24B, and valve 2EGO-116 which constituted the alternate lube oil flow path for the 2-2 EDG.

Reason for Violation

During extended Emergency Diesel Generator (EDG) operation, the alternate lube oil strainer may be placed in service if the main lube oil strainer becomes clogged and exhibits high differential pressure. The alternate strainer was added to the EDG during the later stages of pre-operational acceptance testing as a result of the main strainer developing a high differential pressure. The alternate strainer provides the ability to perform maintenance on the main strainer without shutting down the EDG.

When the EDG is tested, the support systems such as cooling water, air start, fuel oil, and lubricating oil are tested with the unit in normal system arrangement. The alternate lube oil strainers were considered to be in a functional standby condition but isolated and not routinely valved-in.

The alternate strainers were periodically maintained through performance of an 18 month preventative maintenance procedure which isolated, inspected, and cleaned the strainer. Following this cleaning, the strainer remained isolated and clean in a standby configuration. This practice was considered adequate.

Corrective Steps Taken and Results Achieved

The monthly Operating Surveillance Tests (OST) for the EDGs were revised on a one time basis to allow operation of the EDG with the alternate lube oil strainer in service in place of the main lube oil strainer. On June 20, 1991, and on July 11, 1991, EDG 2-2 and EDG 2-1, respectively, were tested with the lube oil flow path aligned to the alternate strainer. The OST stroked all valves through one complete cycle. Lube oil flow was established through the strainers and all valves were fully stroked resulting in all components functioning as expected.

Corrective Steps to Avoid Further Violations

The valve stroke test, OST 2.47.3A, will be revised to exercise the inlet and outlet isolation valves for the alternate lube oil strainers, 2EGO-114, -115, -116 and -117, and the isolation valves for the main lube oil strainers, 2EGO-106, -107 -108 and -109 on a quarterly frequency. These valves will also be added to the BV-2 IST program as Category B valves. As such, they will be required to be exercised quarterly and to have appropriate corrective action taken if they fail to exhibit the required change of valve stem or disk position.

Preventative Maintenance Procedure 2-36EGS-EG2-1-2-1M will be revised to ensure that the alternate lube oil strainers are properly filled and vented prior to placing them in service and will be upgraded to a Maintenance Surveillance Procedure (MSP) to be performed on a refueling frequency. In addition, the MSP will valve in the alternate strainer with the EDG running on a refueling frequency to demonstrate that the strainer will operate from an on-demand condition.

Date When Full Compliance Will Be Achieved

The quarterly valve stroke test, OST 2.47.3A, will be revised to include the alternate and main lube oil strainer isolation valves before the next performance of the OST scheduled for September 30, 1991.

The alternate and main lube oil strainer isolation valves will be included in the next revision of the BV-2 IST Program document which is scheduled to occur by December 31, 1991.

PMP 2-36EGS-EG2-1-2-1M will be revised by the BV-2 third refueling outage presently scheduled to begin March 13, 1992.