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December 26, 1978

United States Nuclear Regulatory Commission
Attention: Mr. George H. Smith, Chief
Fuel Facility and Materials Safety Branch
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. 78-32

Dear Mr. Smith:

In response to your letter of December 1, 1978 and in accordance with 10 CFR 2.201, the attached reply addresses the Notice of Violation which was included as Appendix A of the referenced Inspection Report. The noted violations included: (1) improper sampling technique for liquid waste discharges, (2) failure to adequately test filters, and (3) failure to follow Radcon procedures.

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

Very truly yours,

C. N. Dunn, *RAE*

C. N. Dunn
Vice President, Operations

Attachment

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DUQUESNE LIGHT COMPANY
Beaver Valley Power Station
Unit No. 1

REPLY TO NOTICE OF VIOLATION
Inspection No. 78-32
Letter Dated December 1, 1978

INFRACTION A

Description Of Infraction (78-32-02)

Technical Specification 4.7.8.1.b requires, in part, that each Supplemental Leak Collection and Release System (SLCRS) exhaust air filter train be demonstrated operable after each complete or partial replacement of a HEPA filter or charcoal adsorber bank by:

1. Verifying that the charcoal adsorbers remove $\geq 99\%$ of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the ventilation system at a flow rate of 36,000 cfm $\pm 10\%$.
2. Verifying that the HEPA filter banks remove $\geq 99\%$ of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the ventilation system at a flow rate of 36,000 cfm $\pm 10\%$.
3. Subjecting the carbon contained in at least one test canister or at least two carbon samples removed from one of the charcoal adsorbers to a laboratory carbon sample analysis and verifying a removal efficiency of $\geq 90\%$ for radioactive methyl iodide at an air flow velocity of 1.35 ft/sec $\pm 20\%$ with an inlet methyl iodide concentration of 0.05 to 0.15 mg/m³, $\geq 95\%$ relative humidity, and $\geq 125^{\circ}\text{F}$; other test conditions shall be in accordance with USAEC RDT Standard M-16-1T, June, 1972.

Contrary to the above requirement, both SLCRS charcoal adsorber banks were replaced on March 21-22, 1978, and subsequently the reactor was operated during the period April through July 1978, without tests 2 and 3 (above) having been performed as required. Tests of the HEPA filters had not been performed and the tests of carbon samples had been performed at an improper face velocity and methyl iodide concentration.

Discussion Of Infraction

As noted in the inspection report, the tests on the HEPA filter banks were not performed because of a misinterpretation of the technical specifications. The methyl iodide removal tests were not performed at the correct face velocity or methyl iodide concentration because, although the vendor who performed the tests had the correct values, the individual performing the test failed to adequately review the technical specification for Beaver Valley Power Station.

Corrective Action

The tests required by Technical Specification 4.7.8.1.b were performed on the SLCRS filter banks on November 21, 1978 with satisfactory results.

Action Taken To Prevent Recurrence

Appropriate station personnel have been informed of the technical specification requirements. The vendor has been contacted and his procedure has been changed to require the technical specification values to be provided by site personnel when the tests are being performed.

Date On Which Full Compliance Will Be Achieved

We are in full compliance at this time.

INFRACTION B

Description Of Infraction (78-32-03)

Technical Specification (TS) 6.11, "Radiation Protection Program", requires that "procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure."

1. Radcon procedure 4.1, "Requirements for setting up a frisker station", developed pursuant to TS 6.11, requires in step 3.2.1 that the alarm be set at a point 100 cpm above general background.

Contrary to the above requirement, on November 5, 1978, four friskers at the exit of the radiation control area had alarm setpoints greater than 100 cpm above general background. Three of the four were set at 400 cpm above general background; the fourth was set at 300 cpm above general background.

2. Radcon procedure 10.1, "Respiratory Equipment", developed pursuant to TS 6.11, requires in step 3.1.2 that as respiratory equipment is issued it shall be logged on the Respiratory Equipment Log. In step 3.7 it states that it is the responsibility of the individual to whom respiratory equipment is issued to return the equipment to the issue point after each use (except when Radcon designates otherwise) and to assure that the equipment is logged back in.

Contrary to the above requirements, at least 363 respirators logged out in August and September had not been logged in; 26 of these were improperly logged in that no name was logged on the log sheet; 43 of these were improperly logged in that no respiratory type was logged at the time of issue.

Discussion Of Infraction (B.1)

Frisker operation and alarm setpoints are checked on a daily basis. The alarm setpoints are adjusted as required. Occassionally it may be necessary to change alarm setpoints because of background variations. Although the friskers are equipped with an audible alarm, Frisker Station Instructions posted per RP 4.1 (signs posted at each frisker station) state that personnel are to note the meter reading as a positive indication of contamination. The Beaver Valley Power Station frisker limits are conservatively established. Radiation safety is not considered compromised because contamination would be detected during a personnel frisk if the alarm suddenly became inoperative.

Corrective Action (B.1)

The frisker alarm setpoints were adjusted immediately upon discovery.

Action Taken To Prevent Recurrence (B.1)

The daily frisker operational check record has been revised to document as-found alarm settings. The records will be reviewed by Radcon supervision to evaluate if further action is required to maintain proper frisker alarm setpoints.

Date On Which Full Compliance Will Be Achieved (B.1)

Full compliance has been achieved as of December 10, 1978.

Discussion Of Infraction (B.2)

The exit points from controlled areas presently have respirator collection drums to be used only on occasion at the direction of Radcon. The arrangement is not conducive to the control and return of respirators to the issue point.

Corrective Action (B.2)

The collection drums have been eliminated. Signs have been made for placement at the former drum locations to direct the respirators be returned to the issue point. Yellow plastic bags will be issued with each respirator to provide means for return of same.

Action Taken To Prevent Recurrence (B.2)

The log sheets will be used to identify the individuals in need of additional training concerning the proper return of respirators.

Date On Which Full Compliance Will Be Achieved (B.2)

The program will be fully implemented by January 31, 1979.

INFRACTION C

Description Of Infraction (78-32-01)

Environmental Technical Specification 2.4.2.3 requires in part for liquid effluent discharges that "Prior to taking samples from a monitoring (test) tank, at least two tank volumes of entrained fluid shall be recirculated through the mixing eductors."

Contrary to the above requirement, samples used to evaluate liquid effluent discharges were taken without the required two tank volumes of recirculation on May 20, May 21, May 25, and July 21, 1978.

Discussion Of Infraction

Data on recirculation time is recorded on three different documents. The initiation of tank recirculation is recorded on the operator log sheets when a tank is full. The sample time is recorded on a computer printout which also contains various activity levels. The RLWDAs contain recirculation START and STOP times. The START time is transcribed from the operator log sheets via telephone or party page. The STOP time is the time the pump was stopped and is at a time later than the sample time.

Transcribing data via the party page or telephone has not proven accurate.

Supervisors signing-off RLWDA sheets are looking at the pump START and STOP times and see an acceptable recirculation time.

Auditors look at the transcribed pump START time and the sample time and have noted discrepancies.

Corrective Action

This problem was identified previously and addressed by letter BVPS:LGS:29, dated August 19, 1978. The supervisors were instructed concerning poor record keeping, transcribing of data, and accurate review prior to sign-off.

Action Taken To Prevent Recurrence

An OMCN has been issued to direct the operator to log the start of a tank recirculation both in his log and on a plastic status board on the control board. This board will also display the required recirculation time for the various systems. A memorandum has been distributed to all operators requiring them to use the Radtech sample time as recirculation stop time to assure agreement on the various logs as to recirculation time. The plastic status board will be installed by January 30, 1979.

Date On Which Full Compliance Will Be Achieved

We are in full compliance at this time.