

# Duquesne Light Company

Beaver Valley Power Station  
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JOHN D. SIEBER  
Vice President - Nuclear Group

January 21, 1992

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

Subject: Beaver Valley Power Station, Unit No. 1  
Docket No. 50-334, License No. DPR-66  
Inspection Report 50-334/91-23

In response to NRC correspondence dated December 24, 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. K. L. Ostrowski at (412) 393-5104.

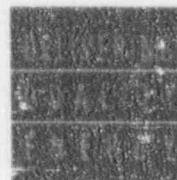
Sincerely,

*J. D. Sieber*  
J. D. Sieber

## Attachment

cc: Mr. J. Beall, Sr Resident Inspector  
Mr. T. T. Martin, NRC Region I Administrator  
Mr. E. C. Wenzinger, Chief, 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, Unit No. 1

Reply to Notice of Violation

Combined Inspection Report 50-334/91-23 and 50-412/91-22  
Letter dated December 24, 1991

VIOLATION (Severity Level IV; Supplement I)

Description of Violation (50-334/91-23-01)

Technical Specification 6.8.1.a, requires that written procedures be established, implemented, and maintained, covering activities listed in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Contrary to the above, on November 6, 1991, operators failed to follow the procedures contained in the Operating Manual as evidenced by the following two examples.

- (1) Operating Manual 1.24.4.P, "Steam Generator 1A(1B)(1C) Level Low", Issue 2, Revision 35, required that action be taken to restore low steam generator level to normal. Operators failed to restore Steam Generator 1A Level to normal, following receipt of the low level alarm. Operators initiated steam generator blowdown, further reducing steam generator level, which resulted in automatic start of the auxiliary feed pump on low-low level.
- (2) Operating Manual 1/2.48.5.VI, "Conduct of Operation", Issue 3, Revision 4, required major equipment status changes be logged in the reactor operator log and the nuclear shift operating foreman log. The initiation of steam generator blowdown was not documented in either of the above logs.

Reason for the Violation

This violation occurred because control room operators did not maintain complete awareness of plant conditions in that they initiated blowdown flow, thus reducing steam generator level, at a steam pressure where the ability to replenish steam generator level using the condensate pumps was limited.

Failure to log initiation of blowdown flow occurred because the crew believed it was a routine evolution.

Corrective Action Taken

At the time of the event, operations personnel stabilized steam generator levels and secured the auxiliary feedwater pump.

Operations shift crews were briefed on the event during shift meetings.

Action Taken to Prevent Recurrence

The circumstances surrounding this violation will be reviewed with emphasis on procedure compliance and log keeping in Module 3 of Unit 1 and 2 License Retraining.

A Human Performance Enhancement System evaluation has been initiated on the event associated with this violation. Additional corrective actions may be initiated based on the evaluation. This evaluation will be complete by April 3, 1992.

The procedure step to start the main feedwater pump will be evaluated to determine if the pump should be started earlier in the heatup. This evaluation will be completed by April 3, 1992.

A precaution will be added to the start-up procedure to provide additional information concerning the shutoff head of the condensate pumps. This action will be completed by April 3, 1992.

An Operating Manual Deficiency Report has been written on Operating Manual 1.24.4.P. "Steam Generator 1A(1B)(1C) Level Low". The alarm response will be evaluated to determine if additional steps are necessary to address restoration of feedwater and isolation of blowdown.

Date of Full Compliance

The station is in full compliance at this time.

Module of Unit 1 and 2 License Retraining will be completed by June 26, 1992.

The Human Performance Enhancement System Evaluation will be completed by April 3, 1992.

All procedure changes addressing this violation will be evaluated by April 3, 1992.