



**Duquesne Light**

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May 14, 1984

✓ U.S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Attn: Mr. Thomas T. Martin, Director  
Division of Engineering and Technical Programs  
Region 1  
631 Park Avenue  
King of Prussia, PA 19406

Reference: Beaver Valley Power Station, Unit No. 1  
Docket No. 50-334, License No. DPR-66  
Inspection Report 84-06

Gentlemen:

In response to your letter of April 12, 1984, and in accordance with 10CFR2.201, the attached reply addresses the Notice of Violation which was included with the referenced inspection report. Our response addresses the steps taken to improve the effectiveness of our management control systems in addition to describing our specific corrective actions.

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

Very truly yours,

J. J. Carey  
Vice President, Nuclear

Attachment

cc: Mr. W. M. Troskoski, Resident Inspector  
U.S. Nuclear Regulatory Commission  
Beaver Valley Power Station  
Shippingport, PA 15077

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DUQUESNE LIGHT COMPANY  
Beaver Valley Power Station  
Unit No. 1

Reply to Notice of Violation  
Inspection 84-06  
Letter dated April 12, 1984

VIOLATION A (Severity Level IV; Supplement 1)

Description of Violation (84-06-01)

Technical Specification paragraph 4.0.5 states in part that inservice testing of pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10CFR50, Section 50.55a(g), except where specific written relief has been granted by the Commission. Section XI, Subsections IWP and IWV, provides specific requirements for testing pumps and valves, respectively. IWV paragraph 3410 states that valves "shall be exercised at least once every three (3) months."

10CFR50 Appendix B Criterion I states that "The authority and duties of persons and organizations performing activities affecting the safety related . . . components shall be clearly established and delineated in writing," and Criterion XVIII states that "a comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program."

The Beaver Valley QA Procedure OP-1 paragraph 1.1.7 states that the Operations Quality Assurance Program is written to conform to the applicable requirements of Appendix B to 10CFR50. QA Procedure OP-3, paragraph 3.3, states in part that directives and detailed procedures shall be developed, administrative procedures shall be established prescribing activities affecting safety-related items including revisions or changes thereto and shall delineate responsibilities and authorities of the plant staff.

Technical Specification 6.8 states that written procedures shall be established and implemented for surveillance and test activities of safety-related equipment and shall be reviewed by the OSC (Onsite Safety Committee).

Contrary to the above, the following are examples of a lack of management controls including quality assurance for the Inservice Testing Program for pumps and valves:

1. Hydrogen recombiners valves MOV-1HY-201A and MOV-1HY-201B are required to be tested quarterly in accordance with ASME Section XI 1WV-3410, and the valves were not being tested quarterly. These valves had specifically been denied relief from quarterly testing in a letter dated June 29, 1982 from NRC to Beaver Valley.

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#### Description of Violation (continued)

2. There were no approved procedures clearly delineating the authorities, duties, and responsibilities for the inservice testing of pumps and valves from the highest management level through intermediate levels to and including the technical support activities.
3. The QA audits conducted of the Inservice Testing Program for pumps and valves during operations provided no coverage of the aspects of the test procedure implementation and the actual conduct of testing.
4. An annual QA audit of inservice testing of pumps and valves was being conducted on February 15, 1984, using an unapproved copy of the updated Inservice Testing Program for pumps and valves.
5. The Beaver Valley Unit 1 Inservice Testing Program for pumps and valves 20-month update was submitted to the NRC on March 28, 1983, and placed in use at the station without being reviewed and approved by the Onsite Safety Committee (OSC).

#### Discussion

As a result of our review of the circumstances associated with this violation, extensive procedure development has been initiated to eliminate the concerns regarding the lack of management controls in the area of the Inservice Testing Program for pumps and valves. Our actions, as outlined below, should improve the effectiveness of our management control for this program. The specific actions taken in regard to the five examples cited in the Notice of Violation have also been addressed in this reply.

#### Immediate Corrective Action and Results Achieved

- The Testing and Plant Performance (T&PP) administrative procedure which covers T&PP personnel and their authorities and responsibilities for pump and valve inservice testing has been approved and issued.
- A letter outlining the Station's plan of action concerning the development of Site Administrative Procedures was issued on April 5, 1984.
- A meeting was held on April 30, 1984 to discuss the specific content and form of the procedures for the ISI Program.

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Specific Actions Taken (continued)

2. There were no approved procedures clearly delineating the authorities, duties, and responsibilities for the inservice testing of pumps and valves from the highest management level through intermediate levels to and including the technical support activities.

Actions Taken:

The T&PP administrative procedure which covers T&PP personnel and their authorities and responsibilities for pump and valve inservice testing has been issued. Additional administrative procedures which clearly delineate the authorities, duties, and responsibilities for the IST Program from the highest management level through the intermediate levels to and including the technical support activities are being developed as previously described in this response.

3. The QA audits conducted of the Inservice Testing Program for pumps and valves during operations provided no coverage of the aspects of the test procedure implementation and the actual conduct of testing.

Actions Taken:

Duquesne Light Company Quality Assurance Unit has formed a permanent surveillance activity to perform ongoing operating plant surveillances in accordance with Quality Assurance Instruction 18.3.2, "Quality Assurance Surveillances." Surveillances will also be conducted in conjunction with the auditing of departments whose responsibilities include testing functions.

In future Inservice Testing Audits, quality assurance surveillances will be performed to provide coverage of test procedure implementation and the actual conduct of pertinent tests.

Designated surveillance personnel are currently working with the Quality Assurance Unit. Full compliance has been achieved.

4. An annual QA audit of inservice testing of pumps and valves was being conducted on February 15, 1984, using an unapproved copy of the updated Inservice Testing Program for pumps and valves.

Actions Taken:

Future Duquesne Light Company Quality Assurance audits of the Inservice Testing Program for pumps and valves will be performed with the approved and controlled Inservice Testing Program for pumps and valves.



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Specific Actions Taken (continued)

4. Actions Taken: (continued)

To ensure the adequacy of the 1983 audit of the Inservice Testing Program for pumps and valves (Audit BV-1-84-04), a review will be performed after final Duquesne Light Company management approval of the Inservice Testing Program for pumps and valves. The review will be conducted by the Duquesne Light Company Quality Assurance Unit, and will compare the approved Inservice Testing Program for pumps and valves to the unapproved Inservice Testing Program used during the performance of the quality assurance audit. Any changes noted in the approved Inservice Testing Program will be evaluated to ascertain their effect on Audit BV-1-84-04.

Full compliance will be achieved within thirty days of the final approval of the Inservice Testing Program for pumps and valves.

5. The Beaver Valley Unit 1 Inservice Testing Program for pumps and valves 20-month update was submitted to the NRC on March 28, 1983 and placed in use at the station without being reviewed and approved by the Onsite Safety Committee (OSC).

Actions Taken:

The T&PP administrative procedure governing the IST Program requires that controlled copies of the program be used. The IST Program, which includes the 20-month update submitted to the NRC on March 28, 1983, will be reviewed by the OSC by June 1, 1984. The administrative procedures being developed will require all revisions to the program to be reviewed by the OSC and approved prior to issuance.