

April 2, 1997

Mr. J. E. Cross  
President  
Generation Group  
Duquesne Light Company  
Post Office Box 4  
Shippingport, Pennsylvania 15077

SUBJECT: NRC INTEGRATED INSPECTION REPORT 50-334/96-10, 50-412/96-10 AND  
NOTICE OF VIOLATION

Dear Mr. Cross:

This letter refers to your March 24, 1997 correspondence, in response to our  
February 21, 1997 letter.

Thank you for informing us of the corrective and preventive actions documented in your  
letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

**Original Signed By:**

Peter W. Eselgroth, Chief  
Projects Branch 7  
Division of Reactor Projects

Docket No.

cc: w/o cy of Licensee's Response Letter  
S. Jain, Vice President, Nuclear Services  
R. LeGrand, Vice President, Nuclear Operations  
L. Freeland, Manager, Nuclear Engineering Department  
B. Tuite, General Manager, Nuclear Operations Unit  
K. Ostrowski, Manager, Quality Services Unit  
R. Brosi, Manager, Nuclear Safety Department

cc: w/cy of Licensee's Response Letter  
M. Clancy, Mayor  
Commonwealth of Pennsylvania  
State of Ohio

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G PDR



Distribution w/cy of Licensee Response Letter

Region I Docket Room (with concurrences)

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D. Brinkman, PM, PDI-2, NRR

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Inspection Program Branch, NRR (IPAS)

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# Duquesne Light Company

Beaver Valley Power Station  
P.O. Box 4  
Shippingport, PA 15077-0004

SUSHIL C. JAIN  
Division Vice President  
Nuclear Services  
Nuclear Power Division

March 24, 1997

(412) 393-5512  
Fax (412) 643-8069

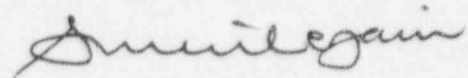
U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555-0001

**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**  
**Integrated Inspection Report 50-334/96-10 and 50-412/96-10**  
**Reply to Notice of Violations**

In response to NRC correspondence dated February 21, 1997, and in accordance with 10 CFR 2.201, the attached reply addresses the Notice of Violations transmitted with the subject inspection report.

If there are any questions concerning this response, please contact Mr. J. Arias at (412) 393-5203.

Sincerely,



Sushil C. Jain

## Attachment

- c: Mr. D. M. Kern, Sr. Resident Inspector  
✓ Mr. H. J. Miller, NRC Region I Administrator  
Mr. D. S. Brinkman, Sr. Project Manager  
Mr. R. W. Cooper, II, Director of Reactor Projects, Region I



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DUQUESNE LIGHT COMPANY  
Nuclear Power Division  
Beaver Valley Power Station, Unit No. 1 and No. 2

Reply to Notice of Violation

Integrated Inspection Report 50-334/96-10 and 50-412/96-10  
Letter Dated February 21, 1997

**VIOLATION A (Severity Level IV, Supplement I)**

Section 70.24(a) of Title 10 of the Code of Federal Regulations, requires, in part, each licensee authorized to possess special nuclear material (SNM) in a quantity exceeding those identified, to maintain a radiation monitoring system in each area where SNM is handled, used or stored that will alarm if accidental criticality occurs. Furthermore, applicable emergency procedures must be maintained to ensure personnel are withdrawn to an area of safety when the alarm sounds.

Contrary to the above, as of February 1, 1997, the licensee had never installed a radiation monitoring system in the Beaver Valley Unit 1 new fuel storage areas capable of alarming should an accidental criticality occur. Furthermore, the licensee's initial exemptions from the requirements of 10 CFR 70.24(a) (contained as part of its original NRC Materials License for possessing SNM) expired when the Beaver Valley Unit 1 construction permit was converted to an operating license in 1976. At that time, the licensee failed to install a radiation monitoring system and implement appropriate emergency procedures, or renew its exemptions. Since then, new fuel storage areas have been used to handle, use and store new fuel assemblies on a regular basis prior to each unit refueling outage.

Reason for the Violation

The reason for the violation was determined to be personnel error by Duquesne Light Co. (DLC) Licensing personnel. Licensing personnel failed to recognize that the original BV-1 Operating License did not contain an exemption from 10 CFR 70.24 requirements and consequently failed to take corrective action.

Corrective Actions Taken and Results Achieved

On December 18, 1996, DLC submitted to the Nuclear Regulatory Commission (NRC) an exemption request from the requirements of 10 CFR 70.24 for BV-1. The NRC subsequently requested additional information to support the review of the exemption request. DLC is in the process of providing this additional information and will submit it to the NRC by April 10, 1997.

Corrective Actions to Prevent Further Violations

Currently, there are no new fuel assemblies in the BV-1 new fuel storage areas. DLC will neither store new fuel in the new fuel storage racks nor handle new fuel assemblies in the new fuel storage areas unless the requirements of 10 CFR 70.24 are met or an exemption from the requirements of 10 CFR 70.24 is received. New fuel assemblies for the next BV-1 refueling outage are presently expected to be received onsite in late June 1997.

To ensure fuel cannot be placed in the BV-1 new fuel storage racks, additional administrative controls have been placed on the lockable hatches on top of these racks. A Temporary Post Order was issued by Security, who has physical control of the hatch keys, to add an additional requirement prior to issuance of the keys. This requirement is to obtain the approval of the Division Vice President, Nuclear Operations and of the Director, Nuclear Safety & Licensing before issuing these keys.

Procedural controls will also be established, prior to the receipt of any new fuel assemblies onsite for the upcoming BV-1 refueling outage, to prohibit the handling of new fuel assemblies in the BV-1 new fuel storage areas. These controls will be established by April 30, 1997.

The above controls will remain in place unless the requirements of 10 CFR 70.24 are met or an exemption from 10 CFR 70.24 is received.

DLC will take actions to postpone the scheduled shipments of new fuel assemblies to the BVPS site for the next BV-1 refueling outage, if adequate means to handle and store the new fuel assemblies will not be available by the scheduled date of receipt.

Date When Full Compliance Will Be Achieved

By prohibiting the storage or handling of new fuel assemblies in the BV-1 new fuel storage areas, DLC will be in compliance with the intent of 10 CFR 70.24. These actions will be complete by April 30, 1997.

Full compliance will be achieved when an exemption to the requirements of 10 CFR 70.24 is received for BV-1 or when the requirements of 10 CFR 70.24 are met.



**VIOLATION B (Severity Level IV, Supplement I)**

10 CFR 50, Appendix B, Criterion II, Quality Assurance Program, requires in part that the QA program shall provide control over activities affecting the quality of systems, structures, and components consistent with their importance to safety. Additionally, the program shall take into account the need for special skills to attain the required quality. The program shall be documented by written policies, procedures, or instructions and shall be carried out throughout plant life.

Contrary to the above, station procedures were inadequate to assure vendors met Qualified Suppliers List requirements prior to performing safety related work. As a result, on December 1-2, 1996, a vendor performed safety related leak injection repair services without satisfying applicable quality requirements.

**Reason for the Violation**

The reason for the violation was determined to be inadequate station administrative procedures. The applicable procedures did not provide sufficiently detailed instructions to ensure appropriate station personnel would verify all Qualified Suppliers List (QSL) conditions are met prior to utilizing an existing purchase order.

**Corrective Actions Taken and Results Achieved**

1. Effective January 15, 1997, temporary "Vendor Oversight Interim Program Controls" were instituted. These controls were in addition to the requirements established in the existing site procedures for the control of onsite vendor services. These interim program controls include restricting vendor onsite access until the front page of the "Onsite Service Checklist" has been completed and signed by the responsible Service Coordinator and a copy forwarded to the Manager of Security. Completion of the "Onsite Service Checklist" includes verifying appropriate program requirements are met including:
  - ensuring all Qualified Supplier List (QSL) restrictions/conditions are addressed and
  - ensuring a Blanket Purchase Order Release is obtained from the Nuclear Procurement Department for blanket service purchase orders.
2. A review of all outstanding QA Category 1/A blanket purchase orders was conducted to determine if, during the blanket period, a QSL restriction or condition had been revised or added. Purchase order change notices were issued to incorporate any revised QSL restrictions/conditions into applicable outstanding

blanket purchase orders. The review found that there were no adverse safety consequences as a result of these QSL restrictions/conditions not being applied.

3. Quality Services Procedure (QSP) 7.4, "Vendor Selection, Evaluation and Qualified Suppliers List" was revised, effective January 17, 1997, to require the Quality Services Unit (QSU) to notify the Nuclear Procurement Department (NPD) whenever QSU's evaluation of a QSL supplier results in a purchasing restriction/condition. Furthermore, per QSP 7.4, QSU will request NPD to determine the impact, if any, the restriction/condition will have on any open purchase orders.

#### Corrective Actions to Prevent Further Violations

Additional requirements will be added to existing station administrative procedures to ensure vendors meet the Qualified Suppliers List requirements prior to their performing safety related work. These requirements will include elements of the "Vendor Oversight Interim Program Controls." The procedures to be revised and the schedule for completing the revisions is as follows:

1. Nuclear Power Division Administrative Procedure (NPDAP) 9.5, "Request for Contracted Services" will be revised by April 15, 1997. The revision will include requirements for initiating purchase order changes if a QSL condition or restriction change is implemented after the issuance of a purchase order. Also, as an enhancement, completion of the "Vendor Performance Evaluation Record," included in the NPDAP, will be required for all services that could affect permanent plant systems, structures or components.
2. NPDAP 9.8, "Request for Contracted Services" will be revised by April 15, 1997, to address the implementation and control of Blanket Service Purchase Orders.
3. The Manager of Nuclear Procurement will issue a letter to NPD personnel by March 31, 1997, providing additional guidance on the handling of purchase orders for material. In particular, it will focus on NPD personnel responsibilities following notification by QSU per QSP 7.4 of a new QSL purchasing restriction/condition.
4. NPDAP 9.1, "Material Management," will be revised by May 15, 1997, to provide specific actions to take for material purchase orders when changes to QSL restrictions/conditions occur.

Date When Full Compliance Will Be Achieved

With the implementation of the interim program controls described in this response and the changes to Quality Services Procedure 7.4, Duquesne Light is in full compliance at this time.

Once the administrative procedure changes described above have been incorporated into those procedures, the interim program controls will be discontinued.