

ENCLOSURE

NOTICE OF VIOLATION

Duquesne Light Company (DLC)  
Beaver Valley Power Station

Docket Nos. 50-334; 50-412  
License Nos. DPR-66; NPF-73  
EA 96-076

During NRC inspections conducted between December 22, 1996, to February 8, 1997 for which exit meetings were held on February 18 and 19, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the particular violations are set forth below:

- A. Technical Specification (TS) 6.8.1.a requires that written procedures be properly established and implemented covering activities recommended in Appendix A to NRC Regulatory Guide 1.33, Revision 2, "Quality Assurance Program Requirements (Operation)." Section 3 of Appendix A to Regulatory Guide 1.33 specifies that procedures be established for operation of safety related systems. Procedure 1/2 OM-48.2.C, "Adherence and Familiarization to Operating Procedures," Rev 17, NPDAM 1.2.1, "Establishment of written directives and procedures," Rev. 3; and Chemistry Manual Chapter 3, "Sampling and Testing," Rev. 7, specify criteria for implementing procedures as written.

Contrary to the above, on numerous occasions, licensee staff did not implement procedures as written, as evidenced by the following examples.

1. When repeatedly depressurizing the Unit 2 residual heat removal (RHS) system from January 23 to January 30, 1997, operators and chemistry technicians did not properly implement station procedures 2OM-10.4.C, "Residual Heat Removal System Shutdown," Rev. 20, and CM 2-3.40 Part D, "RHS Grab Sample Purging to Sample Sink," Rev. 6. Specifically,
  - a. Operators did not perform RHS depressurization as specified in procedure 2OM-10.4.C in that although operators had reviewed 2OM-10.4.C, they continued to depressurize RHS based on their memory of the procedure instead of performing and signing off the procedure step-by-step, as required by Procedure 1/2 OM-48.2.C; and,
  - b. Chemistry technicians did not properly perform steps in procedure CM 2-3.40 in that steps to reposition 2SSR-SOV129A1/A2 were performed out of the required sequence in Section D of the procedure, and Valve SS-175, a primary system sample valve, was not returned to the correct position.

These errors contributed to mispositioning Valve SS-175, which unexpectedly altered the existing RHS depressurization lineup.

2. On January 14, 1997, Unit 1 operators failed to properly implement station procedures OM 1.15.4.H, "Securing a component cooling water (CCR) pump or placing the spare CCR pump in service," Rev. 1, and "1OM-15.3.B.1, Valve List-1CCR," Rev. 7, when securing the 'C' CCR pump. Specifically, the operators did not shut the 'C' CCR pump discharge valve, 1CCR-9, as specified by the Procedure OM 1.15.4.H, Step IV.C.4.b.2, and also failed to annotate system configuration drawings and procedures to reflect this change, as required by Procedure 1/2 OM-48.2.C, Step VI.B.15.

B. Beaver Valley Power Station Technical Specification 4.11.2.6.1 requires oxygen concentration to be monitored during waste gas decay tank (WGDT) filling operations to ensure that an explosive gas mixture is not present.

Contrary to the above, operators failed to monitor oxygen concentration when running the degassifier to the waste gas decay tank (WGDT) on November 30, 1996, since operators had inadvertently deenergized both Unit 1 oxygen analyzers on November 25, 1996, a repeat problem caused by corrective actions previously implemented to address a known human factors issue (look-alike control switches) not precluding recurring misoperation of the oxygen analyzer control switches.

C. 10 CFR 50, Appendix B, Criterion XVI, Corrective Actions, requires, in part, that measures be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective actions taken to preclude repetition.

Contrary to the above, following the identification of mispositioned service water valves 2SWS-82 on July 14, 1995, and 2SWS-MOV-105D on October 3, 1995, and other mispositioned components during this time period, which represented a condition adverse to quality involving inadequate management of plant configuration control, the licensee did not take appropriate measures to correct this condition adverse to quality and prevent recurrence, as evidenced by the fact that numerous component mispositionings occurred which were identified by the licensee during the period September 1996 to February 1997. Poor work practices, personnel errors, and failure to properly implement station procedures continued to result in component mispositionings. Several of the affected components were on safety related systems, including the emergency diesel generator, component cooling reactor, service water, and auxiliary feedwater systems.

These violations are classified in the aggregate as a Severity Level III problem (Supplement I).

Pursuant to provisions of 10 CFR 2.201, Duquesne Light Company (DLC) is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of

Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other actions as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at King of Prussia, Pennsylvania  
this 24th day of March 1997