

APPENDIX B



**Duquesne Light**

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April 2, 1981

United States Nuclear Regulatory Commission  
Office Of Inspection and Enforcement  
Region I ATTN: Boyce H. Grier, Director  
631 Park Avenue  
King of Prussia, PA 19406

Reference: Beaver Valley Power Station, Unit No. 1  
Docket No. 50-334  
Management Meeting Report No. 81-09

Gentlemen:

The Duquesne Light Company Board of Directors approved the formation of a Nuclear Division within the Duquesne Light Company on March 24, 1981.

This division presently consists of one full-time Vice President whose offices are located on the site. We are presently in the process of establishing four Manager positions which will report to the Vice President.

The individuals under consideration for these positions are presently employed by Duquesne Light Company. Should these individuals accept the positions, these jobs will be filled by May 1, 1981.

It is possible that one or more positions may not be filled from within the company. We cannot predict with certainty when any such position will be filled should we be required to recruit candidates from industry. We shall do our best to fill these positions as rapidly as possible. We will keep you informed.

Once these department heads are assigned, approximately 60 days will be required to develop new administrative procedures, revise existing administrative procedures and to obtain approval for necessary technical specification changes for an interim organization. The technical specification change requests will be submitted as soon as possible after our April 3 meeting. We expect to be operating under the interim organization by July 1.

This interim organization will place the department heads in control as shown on Figure A. This interim organization will establish new reporting chains for integral functional groups which can most easily be transferred.

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In addition to installing these department heads, we have taken steps to add the following personnel:

1. Additional clerical and stenographic personnel will be provided to assist key station work groups in processing and filing of paperwork. These will permit more time to be spent by these individuals in managing and supervising work activities.
2. Three additional supervisors for the instrument and control group. These will provide closer supervision and more effective control of the performance of the instrument surveillance program and the maintenance of the security computer.
3. An additional Electrical Maintenance Engineer and an additional Mechanical Maintenance Engineer. These will provide for full time service on the Onsite Safety Committee without detracting from the required technical direction of the work force.
4. Additional personnel in the Licensing and Compliance group to relieve station operating and maintenance supervision from the large majority of special studies and investigations required to respond to regulatory requests.
5. Three additional Quality Control Inspectors and two additional Quality Control Engineers. These will provide for additional coverage of ongoing work activities and the ability to provide assistance to station work groups by responding to requests for advice in the development of work procedures and by the conduct of special studies related to improving the quality of the work.
6. Thirteen additional House and Yard Laborers and two Building Maintenance Foremen. These individuals will implement a station cleanliness program.
7. A group of 16 additional Start-Up Operators have been added to the station staff during this calendar year. This group will provide a stable work force in the plant attendant category.

This group will not be removed from shift assignments to participate in the licensed operator training program but will function permanently as plant attendants. This will provide a stability of the work force which is presently lacking in this area due to the existing practice of rotating the Nuclear Operators into the classroom phases of the program. We anticipate a marked improvement in the performance of the work activities remote from the controlroom to result from this change in our staffing and training philosophy.

We believe that the above described additions to the staff will improve our performance in five of the work areas that were considered to be unsatisfactory as a result of the SALP review. These areas are Station Operations, Station Maintenance, Surveillance, Quality Control and Committee Activities.

A discussion of our plans to improve the performance in the four other areas considered to be in need of improvement follows.

Security and Safeguards. The Following Corrective Actions To Improve Performance Are In Progress.

1. Reduce Guard Force by 30% beginning April 15.
2. Began in December rewriting lesson plans to improve posted Guards performance. Included in these lesson plans are specifics for each post. All lesson plans for watchmen will be completed by April 30. Lesson plans for the armed patrols, are being rewritten. Armed Guard retraining on procedures begins in May. This training will be completed by August 31.
3. The security contractor has provided an additional training supervisor on site to assist in the development of these lesson plans.
4. All written security procedures are being reviewed by Duquesne Light Company personnel. This review and all necessary revisions will be completed by September 30, 1981. However, as procedures are revised and incorporated into the training, they will be implemented in advance of the completion date.
5. Employee indoctrination lesson plans are being revised to include a description of the manner in which employees are to utilize the recently completed security devices including the card access system.
6. Instructions for use of card reading devices to gain entry to a vital area will be posted adjacent to the most heavily used card readers. The preparation of the legend plates is already in progress at the Duquesne Light Company Substation and Shops Department in Pittsburgh.

Design Changes And Modifications And Management Controls

The problems identified as a lack of management controls or coordination of the design change and modifications will be corrected by placing these activities in the same corporate division. Major objectives of the restructuring of the nuclear activities is to shorten communication lines, to exercise greater control over contractor, and to provide timely, complete responses to regulatory issues and concerns.

Fire Protection

Two studies have been completed on problems associated with the fire protection system. The motor for the motor-driven fire pump has undergone extensive testing and repair at the Westinghouse repair shop. The pump was successfully run on April 2, 1981. A full flow test will be performed by April 15. We will provide the services of a full-time supervisor with only fire protection

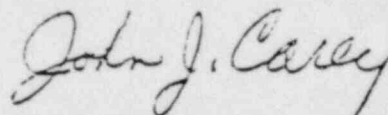
responsibility within the next six months. We are presently reviewing our spare parts inventory for fire protection equipment. We shall initiate actions to increase the inventory of spare parts upon the completion of this study. We are also studying methods to improve the reliability of the hydropneumatic system which provides the normal pressure source for the fire lines. Additional studies are in progress concerning the providing of a cleaner source of gland water for the fire pumps and for remotely obtaining motor bearing temperatures. Another study is presently in progress to establish a maximum load limit for the transport of heavy equipment over the buried portion of the fire lines between the station and the screenhouse. All ongoing studies will be completed by July 1, 1981.

We are taking the following steps to bring specific programmatic, procedural and/or equipment deficiencies to the attention of senior management.

We are in the process of implementing a formal review of station logs by the Station Operating Supervisor to identify irregularities or anomolous conditions which have the potential to affect the safety of operations. This supervisor will initiate actions required to investigate or correct any identified potential safety problems. He will bring to the attention of Senior Station Management any conditions that require actions not under his direct control.

The new organization will include operations, maintenance, and instrument support groups who will be responsible for the conduct of thorough timely reviews of surveillance testing activities for the purpose of identifying irregularities and trends which could affect the safety of operations. The individuals within these groups will also perform assessments of the conduct of the work to identify programmatic or procedural deficiencies. These groups will be established during the calender year of 1981.

Sincerely,



John J. Carey  
Vice President, Nuclear

Enclosures

cc: United States Nuclear Regulatory Commission  
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