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June 4, 1981

Director of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Attn: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing
Washington, DC 20555

Reference: Beaver Valley Power Station, Unit No. 1

Docket No. 50-334, License No. DPR-66

Emergency Procedure and Training for Station Blackout Event

Generic Letter 81-04

Gentlemen:

In accordance with your letter of February 25, 1981, we are providing an assessment of existing and planned station procedures and training programs that concern themselves with station blackout events.

The total loss of all offsite and onsite A.C. power was not considered as a design basis event for Beaver Valley Power Station, Unit No. 1. The existing procedures are written to cover the emergency actions to be taken for loss of offsite A.C. power events only. The Westinghouse Owners Group, of which Duquesne Light Company is an active participant, has a comprehensive development program for emergency operating guidelines to comply with the requirements of NUREG-0737, Item I.C.1. This program was discussed with the NRC staff in February, 1981, and do umented in Westinghouse Owners Group letter OG-54 dated March 18, 1981. With the issuance of Generic Letter 81-04, the Westinghouse Owners Group revised the schedule for development of the emergency guidelines for loss of all A.C. power events. These guidelines will be submitted to the NRC by September 1, 1981 as documented in Westinghouse Owners Group letter OG-56 dated April 9, 1981.

The emergency guidelines being prepared to cover loss of all A.C. power events will address:

- Maintenance of heat removal capability and inventory control with available equipment.
- 2. Basis for estimated time available to restore A.C. power.

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- Actions required to restore emergency onsite A.C. power, including diesel generator loading sequence considerations.
- 4. Precautions to prevent consequential equipment damage due to the return of A.C. power.

The guidelines will be reviewed and plant specific procedures for loss of all A.C. power will be prepared.

The DLC Systems Operation Department procedures used to restore offsite A.C. power to Beaver Valley upon loss of the DLC grid have been reviewed. We believe that the guidance provided is adequate, however, station procedures will be revised to better coordinate actions between onsite personnal and system operations.

The station emergency procedures used to restore offsite power when caused by onsite equipment failures have been randewed and are considered adequate when the onsite emergency A.C. power sure is available. The startup procedures for restoration of the offsite A.C. power exist and are considered adequate. These startup procedures, however, are not presently integrated into the emergency procedures. The emergency procedures will be revised to incorporate the accions necessary to utilize the existing startup methods.

The emergency lighting requirements have been reviewed. The emergency D.C. lighting that is presently on the station emergency batteries is considered adequate for the control room and the access areas that are served by this system. Emergency lighting with self-contained batteries have already been installed for the turbine and auxiliary equipment floors in the turbine building. As required by the new Appendix R of 10 CFR 50, emergency lighting will be provided in those areas where operation of safe shutdown equipment may be required. Access and egress routes to this equipment will also be provided with emergency lighting. The self-contained units are 8 hour units. This additional emergency lighting equipment will be installed on the schedule which we have established for compliance with 10 CFR 50 Appendix R requirements.

We have reviewed training related to the station blackout event and have concluded that the training that is presently provided for the existing procedures is adequate to make the operators aware of the actions required to mitigate a station blackout event. The new procedures that will be developed as a result of the Westinghouse Owners Group guidelines, and any revisions to existing procedures will be included in the annual requalification training program. We will include simulator exercises that involve the postulated loss of all A.C. power and accomplish decay heat removal by natural circulation in the requalification training program. Simulator exercises, as they are integrated into the requalification training program, are performed every two years.

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We believe that the necessary procedures can be written or revised within the time frame contained in your letter (i.e. October, 1981). The installation of the additional emergency lighting has already been scheduled to the requirements of 10 CFR 50.58C. The lighting that can be installed without requiring a plant shutdown will be completed by November 17, 1981. Any lighting that requires a plant shutdown for installation will be completed during the second refueling outage.

Very truly yours,

J. J. Carey

Vice President, Nuclear

cc: D. A. Beckman, Resident Inspector United States Nuclear Regulatory Commission Beaver Valley Power Station Shippingport, PA 15077

> United States Nuclear Regulatory Commission c/o Document Management Branch Washington DC 20555

COMMONWEALTH OF PENNSYLVANIA)

SS:

on this the day of the residence of the said Commonwealth and County, personally appeared J. J. Carey, who being duly sworn, deposed, and said that (1) he is Vice President of Duquesne Light, (2) he is duly authorized to execute and file the foregoing Submittal on behalf of said Company, and (3) the statements set forth in the Submittal are true and correct to the best of his knowledge, information and belief.

Judith D. Unthony
Motory Public

JUDITH D. ANTHONY. Notary Public

Shippingport Borough, Seaver Co., Pa.

My Commission Expires Dec. 12, 1983