

DCS

FEB 23 1994

Docket Nos. 50-334
50-412

Mr. J. D. Sieber
Senior Vice President
Nuclear Power Division
Duquesne Light Company
Post Office Box 4
Shippingport, Pennsylvania 15077

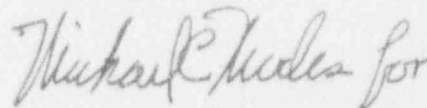
Dear Mr. Sieber:

SUBJECT: 10 CFR 50.54 QUALITY ASSURANCE PROGRAM REVIEW

Reference: Letter, dated November 29, 1993, from John D. Sieber to U.S.N.R.C.
Document Control Desk transmitting proposed changes in UFSAR to refer to
Regulatory Guide 1.88, October 1976 and exception for temporary storage of
quality assurance records

We have received and reviewed the above submittal. We find that the submittal does
not constitute a reduction in commitment and is therefore acceptable as stated.

Sincerely,



Jacque P. Durr, Chief
Engineering Branch
Division of Reactor Safety

08-138

REC-11

FEB 23 1994

Duquesne Light Company


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cc:


G. S. Thomas, Vice President, Nuclear Services
D. E. Spoerry, Vice President, Nuclear Operations
L. R. Freeland, General Manager, Nuclear Operations Unit
K. D. Grada, Manager, Quality Services Unit
N. R. Tonet, Manager, Nuclear Safety Department
H. R. Caldwell, General Superintendent, Nuclear Operations
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
Commonwealth of Pennsylvania
State of Ohio

bcc w/encl:

Region I Docket Room (with concurrences)
W. Lazarus, DRP
D. Lew, DRP
W. Butler, NRR
G. Edison, NRR
V. McCree, OEDO
G. Gramm, NRR


RE:DRS
Modes

1/31/94


RE:DRS
Durr

2/23/94

OFFICIAL RECORD COPY
A:QAREVIEW.BV

Duquesne Light Company

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

JOHN D. BIEBER
Senior Vice President and
Chief Nuclear Officer
Nuclear Power Division

November 29, 1993

(412) 353-8255
Fax (412) 243-8109

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

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
10 CFR 50.54 Quality Assurance Program Description Change

In accordance with 10 CFR 50.54(a)(3), this letter forwards, for NRC approval, proposed changes to the quality assurance program description included in the safety analysis report. An exception to the previously stated position on Regulatory Guide 1.88, "Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records," is requested.

The exception would allow temporary storage of quality assurance records in a one hour fire rated container/facility in accordance with the guidance of ASME NQA-1-1989, Supplement 17S-1, Section 4.4.3. The Updated Final Safety Analysis Report (UFSAR) position statements for Regulatory Guide 1.88 would be revised as follows:

1. The Unit 1 UFSAR position would be revised to be consistent with the Unit 2 UFSAR position on Regulatory Guide 1.88. Specifically, the October, 1976 version of the regulatory guide would be referenced instead of the August, 1974 version, and an exception for temporary storage of quality assurance records would be added.
2. The Unit 2 UFSAR position on Regulatory Guide 1.88 would be revised to include an exception for temporary storage of quality assurance records.

This change is requested to provide guidance when temporary storage of records (such as for processing, review, or use) is required.

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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
10 CFR 50.54 Quality Assurance Program Description Change
Page 2

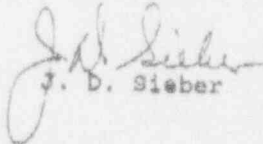
10 CFR 50 Appendix B, Criterion XVII, "Quality Assurance Records," requires that records be identifiable and retrievable. The revised program continues to satisfy this criterion by requiring one hour fire rated containers/facilities for temporary storage of quality assurance records. This is an adequate fire protection time for the temporary storage of records as indicated in ASME NQA-1-1989.

Activities associated with the other criteria of 10 CFR Appendix B are not affected. Therefore, the revised program incorporating the change continues to satisfy the criteria of 10 CFR 50 Appendix B.

Attachment 1 provides excerpts from the plant safety analysis reports showing the text to be revised. Each changed line of text is identified by a side-bar in the margin, added text is shown underlined, and deleted text is marked with a line through it. Attachment 2 provides the safety analysis report pages with the changes incorporated.

If you have any questions regarding this submittal, please contact Ken McMullen at (412) 393-5214.

Sincerely,


J. D. Sieber

Attachments

cc: Mr. L. W. Roebach, Sr. Resident Inspector
Mr. T. T. Martin, NRC Region I Administrator
Mr. G. E. Edison, Project Manager

ATTACHMENT 1
QUALITY ASSURANCE PROGRAM CHANGES

Unit 1 Updated Final Safety Analysis Report Section 1.3

~~REGULATORY GUIDE 1.88, OCTOBER 1976/AUGUST, 1974: COLLECTION, STORAGE, AND MAINTENANCE OF NUCLEAR POWER PLANT QUALITY ASSURANCE RECORDS~~

~~The Duquesne Light Company Operations Quality Assurance Program follows the guidance of Regulatory Guide 1.88 with the exception that single Quality Assurance record storage facilities will be designed and constructed in accordance with the guidance of ANSI/ASME NQA-1-1983, Supplement 17S-1, Section 4.4. The collection, storage and maintenance of quality assurance records at Beaver Valley Power Station will meet the intent of this regulatory guide with the following alternatives:~~

- ~~1. The design and construction of quality assurance record storage facilities will follow the guidance of ANSI/ASME NQA-1-1983, Supplement 17S-1, Section 4.4.~~
- ~~2. When temporary storage of records is required, the guidance of ASME NQA-1-1989, Supplement 17S-1, Section 4.4.3 will be followed.~~

Unit 2 Updated Final Safety Analysis Report Table 1.8-1

~~RG No. 1.88, Rev. 2~~

~~UFSAR Reference Sections 9.5.1, 17.2~~

~~COLLECTION, STORAGE, AND MAINTENANCE OF NUCLEAR POWER PLANT QUALITY ASSURANCE RECORDS (OCTOBER 1976)~~

~~The collection, storage and maintenance of Quality Assurance records at Beaver Valley Power Station BVP6-2 will meet the intent of this Regulatory Guide with the following alternatives:~~

- ~~1. The design and construction of Quality Assurance Record storage facilities will follow the guidance of ANSI/ASME NQA-1-1983, Supplement 17S-1, Section 4.4.~~
- ~~2. When temporary storage of records is required, the guidance of ASME NQA-1-1989, Supplement 17S-1, Section 4.4.3 will be followed.~~

ATTACHMENT 2
SAFETY ANALYSIS REPORT CHANGES

Unit 1 Safety Analysis Report - Page 1.3-50

Unit 2 Safety Analysis Report - Table 1.8-1 (Page 45 of 80)

BVPS-1-UPDATED FSAR

REGULATORY GUIDE 1.70.11: INFORMATION FOR SAFETY ANALYSIS REPORTS
QUALITY ASSURANCE SAFETY OPERATIONS PHASE

The Duquesne Light Company Operations Quality Assurance Program requirements follow the guidance of Regulatory Guide 1.70.11.

REGULATORY GUIDE 1.88, OCTOBER, 1976: COLLECTION, STORAGE, AND
MAINTENANCE OF NUCLEAR POWER PLANT QUALITY ASSURANCE RECORDS

The collection, storage and maintenance of quality assurance records at Beaver Valley Power Station will meet the intent of this regulatory guide with the following alternatives:

1. The design and construction of quality assurance record storage facilities will follow the guidance of ANSI/ASME NQA-1-1983, Supplement 17S-1, Section 4.4.
2. When temporary storage of records is required, the guidance of ASME NQA-1-1989, Supplement, 17S-1, Section 4.4.3 will be followed.

REGULATORY GUIDE 1.144, SEPTEMBER 1980: AUDITING OF QUALITY
ASSURANCE PROGRAMS FOR NUCLEAR POWER PLANTS

Beaver Valley Power Station - Unit 1 (BVPS-1) will meet the intent of Regulatory Guide 1.144 for the auditing of its Quality Assurance Program during the operations phase with the following clarifications and alternatives:

Paragraph C.1

The applicability of the referenced regulatory guides/ANSI standards [RG 1.28: ANSI N45.2, RG 1.28: ANSI N45.2.9, and RG 1.74: ANSI N45.2.10] is as stated in the respective positions on these regulatory guides/ANSI standards as described in the UFSAR.

Paragraph C.3

Scheduled internal audit frequency will be as specified in Paragraph C.4 of Regulatory Guide 1.33, Rev. 2, February 1978.

The pre-audit and post-audit conferences required by Sections 4.3.1 and 4.3.3 of ANSI N45.2.12-1977 may be fulfilled by a variety of communications such as telephone conversations.

REGULATORY GUIDE 1.155, JUNE 1988: STATION BLACKOUT

The utilization of BVPS emergency diesel generators as alternate AC (AAC) power sources for coping with station blackout, and the reliability program for these generators follow the guidance of Regulatory Guide 1.155 (June 1988), 10, 11

BVPS-2 UFSAR

TABLE 1.8-1 (CONT)

RG No. 1.86, Rev. 0
UFSAR Reference Section 5.8 (ER-OLS)

TERMINATION OF OPERATING LICENSES FOR NUCLEAR REACTORS (JUNE 1974)

The guidance of this regulatory guide will be followed when termination of the Beaver Valley Power Station - Unit 2 operating license is desired.

RG No. 1.87, Rev. 1

GUIDANCE FOR CONSTRUCTION OF CLASS 1 COMPONENTS IN ELEVATED TEMPERATURE REACTORS (SUPPLEMENT TO ASME SECTION III CODE CASES 1592, 1593, 1594, 1595, AND 1596) (JUNE 1979)

This regulatory guide is not applicable to Beaver Valley Power Station - Unit 2.

RG No. 1.88, Rev. 2
UFSAR Reference Sections 9.5.1, 17.2

COLLECTION, STORAGE AND MAINTENANCE OF NUCLEAR POWER PLANT QUALITY ASSURANCE RECORDS (OCTOBER 1976)

The collection, storage and maintenance of quality assurance records at Beaver Valley Power Station will meet the intent of this regulatory guide with the following alternatives:

1. The design and construction of quality assurance record storage facilities will follow the guidance of ANSI/ASME NQA-1-1983, Supplement 17S-1, Section 4.4.
2. When temporary storage of records is required, the guidance of ASME NQA-1-1989, Supplement 17S-1, Section 4.4.3 will be followed.

RG No. 1.89, Rev. 1
UFSAR Reference Section 3.11

ENVIRONMENTAL QUALIFICATION OF CERTAIN ELECTRIC EQUIPMENT IMPORTANT TO SAFETY FOR NUCLEAR POWER PLANTS (JUNE 1984)

BVPS-2 electric equipment important to safety is qualified to meet or exceed the intent of IEEE Std. 323-1971 and Category II of NUREG-0588, Rev. 1. For BVPS-2, this includes both safety-related and certain post-accident equipment. When determined possible by Duquesne Light Company, the qualification of this equipment will be upgraded to meet the standards set forth in Category I of NUREG-0588, Rev. 1. In accordance with 10CFR50.49(k), BVPS-2 is not required to requalify electric equipment important to safety (except replacement equipment) in accordance with Regulatory Guide 1.89, Rev. 1. Replacement electric equipment important to safety will be qualified