

SEP 14 1990

Docket Nos. 50-334  
50-412

Duquesne Light Company  
ATTN: Mr. J. D. Sieber  
Vice President  
Nuclear Group  
Post Office Box 4  
Shippingport, Pennsylvania 15077

Gentlemen:

Subject: Inspection Nos. 50-334/90-80 and 50-412/90-80

This refers to your letter dated July 13, 1990, in response to our letter dated May 10, 1990.

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.

On August 16, 1990, Mr. Briggs, of my staff, discussed your responses to items 90-80-03 and 90-80-05 with Mr. Cannizzaro and Mr. Niel of your staff. Regarding item 90-80-03, we understand that the results of the walkdowns will be incorporated into the appropriate procedures during the next major revision after the walkdown has been performed, not at the completion of walkdowns currently scheduled for September 1992. Concerning Item 90-80-05, the scheduled Procedures Generation Package (PGP) revision date of September 1992 was determined to be a typographical error. The correct date is September 1990.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

Lee H. Bettenhausen, Chief  
Operations Branch  
Division of Reactor Safety

cc:

J. J. Carey, Executive Vice President, Operations  
J. D. Crockett, General Manager, Corporate Nuclear Services  
W. S. Lacey, General Manager, Nuclear Operations  
N. R. Tonet, Manager, Nuclear Engineering  
T. P. Noonan, General Manager, Nuclear Operations  
S. C. Fenner, QA Manager

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cc (cont'd.):

K. D. Grada, Manager, Nuclear Safety  
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

bcc:

Region I Docket Room (with concurrences)  
Management Assistant, DRMA  
R. Bellamy, DRSS  
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J. Caldwell, EDO  
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L. Briggs, DRS  
P. Eiselgroth, DRS  
R. Gallo, DRS  
DRS Files (5)

DRS:RI *[Signature]*  
Briggs/ajk/dmg

09/12/90

DRS:RI *[Signature]*  
Eiselgroth

09/13/90

DRS:RI *[Signature]*  
Beckhausen

09/14/90

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BRIGGS/BV 1/2 90-80R/8/20/90 - 0002.0.0  
03/09/88

# Duquesne Light Company

Beaver Valley Power Station  
PO Box 4  
Shippingport, PA 15077-0004

JOHN D. SIEBER  
Vice President - Nuclear Group

(412) 393-6256

July 13, 1990

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

Reference: 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  
Combined Inspection Report Nos. 50-334/90-80 and  
50-412/90-80

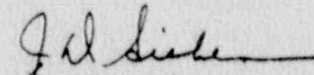
Gentlemen:

The above referenced NRC Inspection Report for the Beaver Valley Power Station Emergency Operating Procedures (EOPs) team inspection was transmitted by NRC correspondence dated May 10, 1990.

The Inspection Report discussed specific strengths and weaknesses of the BVPS EOPs identified during the inspection. Attachment 3 to the report provided a listing of the identified weaknesses for Beaver Valley Unit 2. As requested, attached is our response concerning the actions we have taken or plan to take to address the areas of weakness.

If there are any questions concerning this response, please contact my office.

Very truly yours,

  
J. D. Sieber  
Vice President  
Nuclear Group

Attachment

cc: Mr. J. Beall, Sr. Resident Inspector  
Mr. T. T. Martin, NRC Region I Administrator  
Mr. R. M. Gallo, Chief Operations Branch,  
Division of Reactor Safety  
Mr. A. W. DeAgazic, Project Manager  
Mr. R. Saunders (VEPCO)

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EMP



DUQUESNE LIGHT COMPANY  
Nuclear Group  
Beaver Valley Power Station Units 1 and 2

Reply to Unit 2 Emergency Operating Procedure Weaknesses  
Combined Inspection Report 50-334/90-80 and 50-412/90-80

<u>Item No.</u>	<u>Paragraph</u>	<u>Description</u>
90-80-01	3.4	Discussed in Para. 3.3.a. Develop more fully detailed deviation justification.

Response

BV-2 will review all deviation sheets for this concern and, when warranted, will expand the justification of the deviation to provide more detail. This item will be completed during the next major revision (currently targeted for April 30, 1991).

<u>Item No.</u>	<u>Paragraph</u>	<u>Description</u>
90-80-02	3.4, 5.3	Discussed in Para. 3.3.c and 3.3.d. Correct Note and Caution statement placement and use. Upgrade Writer's Guide to address level of detail concerning local operations and develop means to keep track of Continuous Action Statements in effect.

Response

BV-2 will review Cautions and Notes to ensure they immediately proceed the step to which they apply. In addition, all Cautions will be reviewed to ensure they do not include any action steps. A fold-out page will be developed to track Continuous Action statements. These items will be completed during the next major revision (currently targeted for April 30, 1991).

The PGP has been revised (OMCN 1/2-90-18, dated June 22, 1990) to include the following guidance for local operator actions:

- \* locations of equipment
- \* special equipment required
- \* all necessary directions for performing local operations

The above listed guidance will also be an attribute to be checked on the walkdown checklist.

<u>Item No.</u>	<u>Paragraph</u>	<u>Description</u>
90-80-03	4.4	Discussed in Para. 4.3.a thru d. Upgrade level of detail in procedures and attachments that require local actions. Review and correct procedures directly referenced by the EOPs to ensure appropriateness. Identify and correct valve labeling. Develop EOP attachments to address lengthy local operations.

### Response

Beaver Valley will perform in-plant walkdown validations of EOP attachments, Abnormal Operating Procedures (AOPs) and satellite procedures. This program will utilize a walkdown validation checklist to ensure the following:

- \* location of local equipment is specified
- \* special tools (including keys and communications equipment) is specified
- \* transitions in EOPs and AOPs specify an actual procedure reference
- \* the procedure can be used from an EOP/AOP context
- \* local equipment labels can be clearly read
- \* lengthy local operator actions are performed by using attachments

Beaver Valley has identified 298 documents that will be required to be walked down (EOP/AOP attachments, AOPs and satellite procedures). Since a transition to a normal Station Startup or Shutdown procedure is considered an exit point in the EOP set, these procedures are not included in the above number.

Presently, Beaver Valley is undergoing a broad-based procedure upgrade that is scheduled to be completed by September 1, 1992. In an effort to coordinate this upgrade with the EOP walkdowns, the EOP/AOP satellite procedures will be walked down as part of the procedure upgrade. Therefore, it is expected that the walkdowns will be completed at a rate of 12 procedures/month with an end date of September 1, 1992. This is assuming a September 1, 1990 start date. Each procedure will be walked down using an upgraded Walkdown Checklist. The results of the walkdowns will be incorporated into the appropriate procedures during the next major revision of the EOPs or AOPs (for each unit) following the completion of the walkdowns.

In-plant labels are being modified and EOP/AOP related tags are being given highest priority. The EOP/AOP related equipment should be completely labeled during the next major revision of the EOPs or AOPs (for each unit) following the completion of the walkdowns.

<u>Item No.</u>	<u>Paragraph</u>	<u>Description</u>
90-80-04	5.4	Revise OM 1/2.48.1A to address personnel responsibilities during emergency conditions.

### Response

OM 1/2.48.1A has been revised (OMCN 1/2-90-05, dated April 4, 1990) to clearly delineate personnel responsibilities during emergency conditions. This item is complete.



<u>Item No.</u>	<u>Paragraph</u>	<u>Description</u>
90-80-05	6.4	Discussed in Para. 6.3.1., b, and c. Develop system to cross check any procedural change effect on EOPs. Strengthen feedback to personnel requesting procedure changes and resolve disagreement between temporary procedure change procedure and PGP.

Response

Beaver Valley will identify EOP/AOP related procedures in a PGP Table. These EOP/AOP related procedures will contain a statement in the purpose that will explain their relationship to the EOPs/AOPs (i.e. this procedure is referenced by or entered from an EOP/AOP). Prior to a satellite procedure being revised and issued, it will be walked down using the PGP guidance.

If any procedure is added/deleted to the EOP/AOP satellite procedure table, the referenced OM procedure will be revised to add/delete the reference in the Purpose section.

The present Operating Manual Deficiency Report (OMDR) process requires that the OMDR originator receive a copy of the OMDR and that he be notified if the OMDR is rejected by the Unit Nuclear Operations Manager. The only delay that presently occurs is due to the large volume of paper that must be processed by hand. This delays actual inclusion of a proposed change into the procedure. However the EOP computer should greatly enhance the time involved in incorporating changes and allow EOP changes to be made at an increased frequency. This should allow operations personnel to see their changes in a more timely manner.

The PGP will be revised by September 1, 1992 to allow the use of the Operating Manual Change Notice (OMCN) to allow technically significant changes to be made promptly to the affected EOP.

<u>Item No.</u>	<u>Paragraph</u>	<u>Description</u>
90-80-06	6.4	Discussed in Para. 6.3.d and d. Strengthen PGP to address EOP training and V&V requirements. V&V to include walkdown of in-plant local operations.

Response

The PGP will be revised by September 1, 1990 to define requirements for table-top, walkthrough and simulator validations. The walkdown program will ensure all elements of EOPS/AOPs, including local actions, attachments and referenced procedures are addressed. The walkdown procedure includes a walkdown validation checklist that provides specific areas to be addressed in the walkdowns. As previously stated in response to Item No. 90-80-03, the walkdowns will begin September 1, 1990.

Nuclear Group Training Administrative Manual Chapter 13, "Emergency Procedures Training", is presently being revised to address the training that is currently being conducted for Non-Licensed Operators. This requirement will read as follows:

"Non-licensed operators shall be trained on specific steps and Attachments to the EOPs which require action to be taken outside the Control Room. This training is to ensure that they understand why these actions are being taken, the proper way to perform the task, any precautions involved with these tasks and the location of all equipment necessary to complete the action."

Additional details will also be included in the Nuclear Group Training Administrative Manual Chapter 2, Section 2.1, "Nuclear Operator Program", and Section 2.5, "Non-Licensed Operator Retraining". These changes to the Training Manual will be incorporated by September 1, 1990.

<u>Item No.</u>	<u>Paragraph</u>	<u>Description</u>
90-80-07	Att. 2	Resolution of specific items identified in Attachment 2.

Response

BV-2 will review and resolve each specific item listed in Attachment 2 during the next major EOP revision (presently targeted for April 30, 1991).