

JUN 9 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: ALTERNATIVE TO SERVICE WATER SYSTEM OPERATIONAL
PERFORMANCE INSPECTION (SWSOPI) AT BEAVER VALLEY**

This letter is in response to your request to perform a self-assessment as an alternative to a SWSOPI conducted by the Nuclear Regulatory Commission (NRC), as documented in your letter of May 18, 1994. Duquesne Light Company's presentation to NRC Region I on June 3, 1994, discussed proposed self-assessment details including the scope, administration and organization, plan description, and inspection criteria that are based upon regulatory and industry guidance. Qualifications of the self-assessment team members were also presented. The transparency slides used during this presentation are enclosed.

The NRC's pilot program to authorize licensee self-assessment in area-of-emphasis inspections is designed to minimize regulatory impact and to promote efficient use of NRC resources. However, as specified in Inspection Procedure 40501, "Licensee Self-Assessments Related to Area-of-Emphasis Inspections," the NRC may elect not to reduce its normal inspection scope if significant weaknesses are identified in the self-assessment efforts.

Based on our review, we have concluded that your self-assessment plan is conditionally acceptable for meeting the NRC requirements for such plans. This acceptance is subject to: 1) the NRC in-process and final inspections of your effort, and 2) your completion of the self-assessment, your issuance of a final report, and a presentation of the self-assessment results to the NRC in Region I.

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Mr. J. D. Sieber

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JUN 9 1994

Your cooperation with us in this matter is appreciated.

Sincerely,

Original Signed By:

A. Randolph Blough
for James T. Wiggins, Deputy Director
Division of Reactor Safety

Enclosure: Slides from Meeting on June 3, 1994

cc w/encl:

- G. S. Thomas, Vice President, Nuclear Services
- T. P. Noonan, Acting 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
- K. Abraham, PAO (2)
- 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 (VIA E-MAIL):

- Region I Docket Room (with concurrences)
- W. Butler, NRR
- W. Dean, OEDO
- G. Edison, NRR
- M. Shannon, ILPB
- W. Lazarus, DRP
- D. Lew, DRP
- M. Opredek, DRP
- P. Drysdale, DRS
- F. Bower, DRS

RI:DRS

Bower

4/19/94

6/7/94

RI:DRS

Kelly

4/19/94

6/7/94

NRR

Gillespie

4/19/94

VIA E-MAIL
W/M Johnson

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RI:DRS

for Wiggins

4/19/94

6/9/94

OFFICIAL RECORD COPY

A:BVSWSOPI.FLB

6/9/94

DPC's. Transqual systems
are acceptable

BEAVER VALLEY POWER STATION

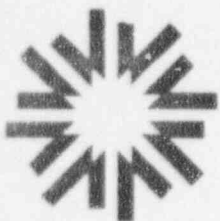
SERVICE WATER SYSTEMS

OPERATIONAL PERFORMANCE

SELF-ASSESSMENT

(NRC SWOPI EQUIVALENT)

DATE: JUNE 3, 1994



Duquesne Light Company

DUQUESNE LIGHT COMPANY

ATTENDEES:

G. S. Thomas

Vice President,
Nuclear Services Division

H. M. Siegel

Manager, Nuclear Engineering

K. E. Woessner

Senior Engineer,
Nuclear Engineering

N. R. Tonet

Manager, Nuclear Safety

AGENDA

- | | |
|----------------------------|----------------|
| I. Background | N. R. Tonet |
| II. Introduction | H. M. Siegel |
| III. Purpose & Scope | K. E. Woessner |
| IV. Organization & Process | K. E. Woessner |
| V. Schedule | K. E. Woessner |
| VI. Review Team | H. M. Siegel |
| VII. Summary | G. S. Thomas |

BACKGROUND

- NRC has identified that Licensing Proposals for self assessments are encouraged.
- Beaver Valley Power Station has 5 years experience in the Self Assessment Process.
- Created SSFE at time NRC created SSFI's.
- Eight Systems at BVPS-1 reviewed by SSFE process - Aux. Fd. Water, Quench Spray, Emergency Diesel Generators, Residual Heat Removal, Recirculation Spray, River Water System, Supplementary Leak Collection and Release, and Electrical Distribution System.

INTRODUCTION

- **Provide Confidence**
- **Obtain NRC Agreement**
- **Effectively Utilize Resources**

PURPOSE

- Assess adequacy of BVPS planned and completed actions in response to GL 89-13, "Service Water System Problems Affecting Safety-Related Equipment."
- Verify that the BVPS River Water (RW) and Service Water (SWS) Systems are capable of fulfilling their thermal-hydraulic performance requirements and are operated consistent with their design basis.
- Assess the RW/SWS operational controls, maintenance, surveillance, and other testing, and personnel training to ensure that these systems are properly operated and maintained so as to perform their safety-related functions.

SCOPE

Assessment to include the following review areas:

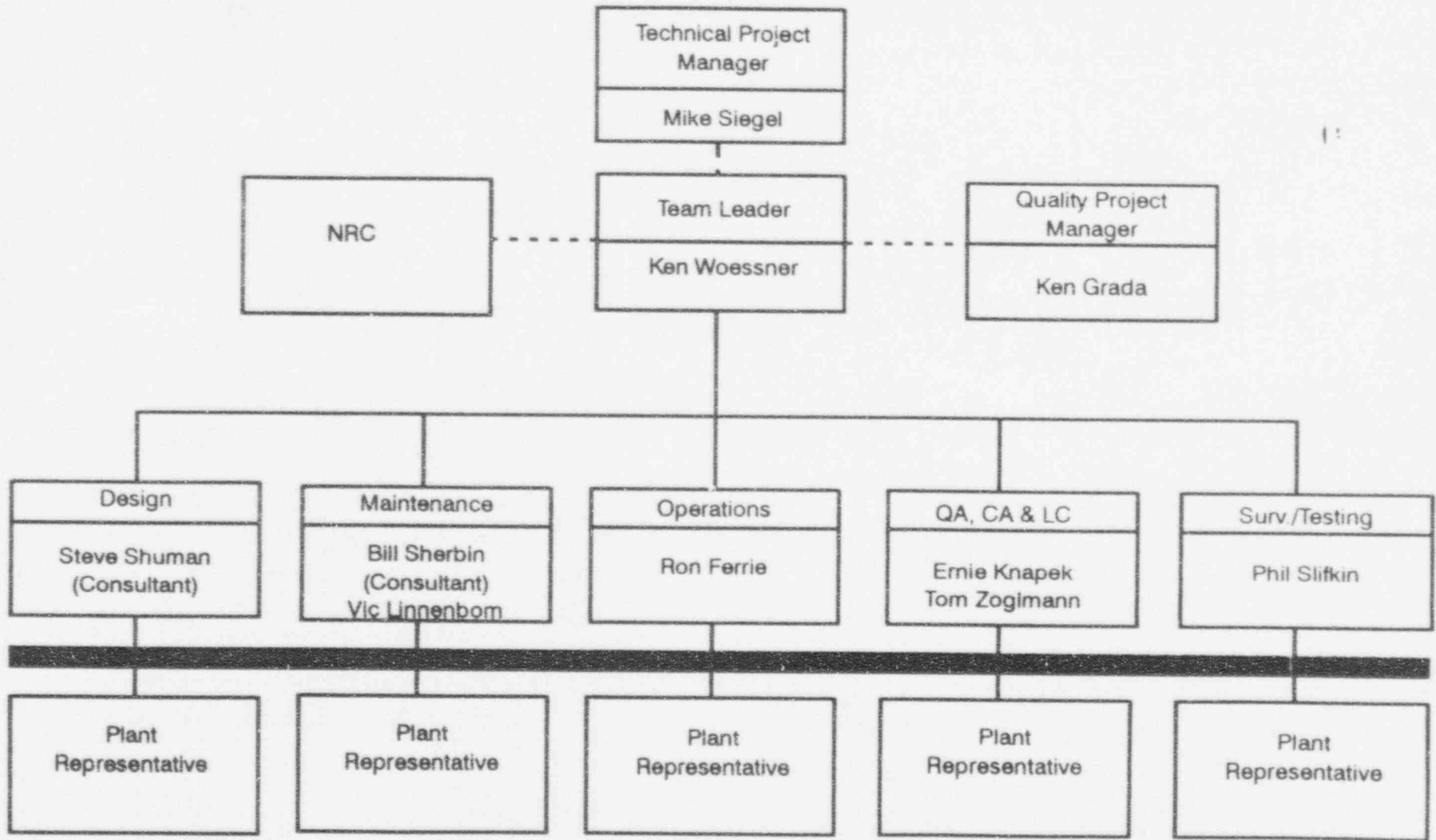
- Design Requirements
- Operations
- Maintenance
- Surveillance and Testing
- Quality Assurance
- Corrective Actions
- Licensing Compliance (including Generic Letter 89-13)

Generic Letter 89-13 Review

- Assess surveillance and control programs to reduce flow blockage due to biofouling;
- Assess status of test programs to verify heat transfer capability of all safety related heat exchangers cooled by RW/SWS;
- Ensure establishment of routine inspection and maintenance programs for corrosion, erosion, protective coating failure, silting & biofouling such that performance of safety related systems is not degraded;
- Confirm that each system will perform its intended function in accordance with Licensing Bases;
- Confirm that maintenance practices, operating and emergency procedures and training are adequate to ensure that safety related equipment cooled by the RW/SWS systems will function as intended and that plant operators will effectively utilize this equipment.

SWOPI SELF ASSESSMENT

TEAM ORGANIZATION AND INTERFACES



LEGEND

————— Daily contact anticipated
 - - - - - Communication as needed

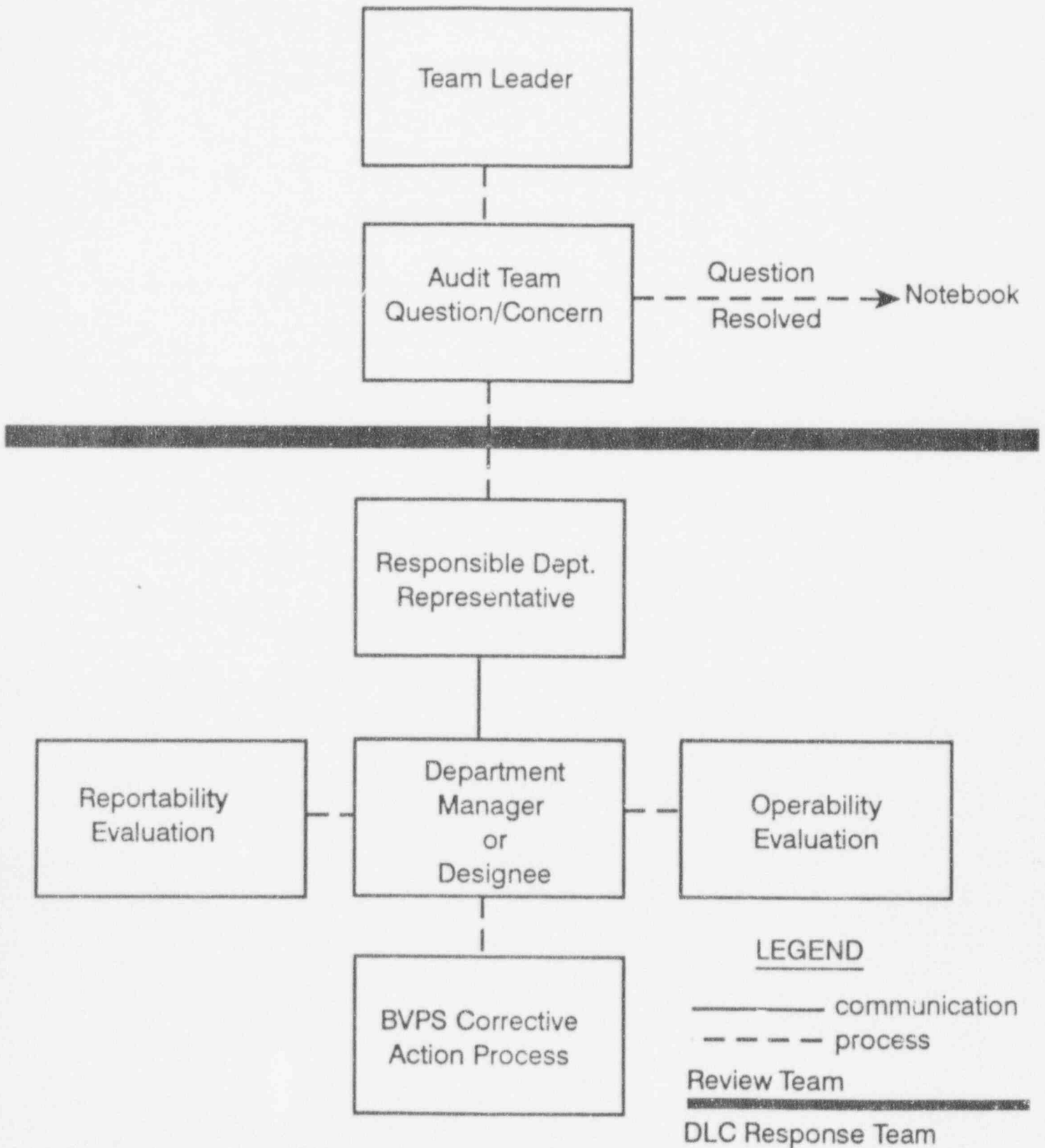
Review Team
—————
 DLC Response Team

NOTE: One plant representative will also act as response team coordinator.

SELF ASSESSMENT PROCESS

- Team Orientation & Training
- Use of EPRI SWOPI Checklist
- Daily team/BVPS interface meetings (2 different meetings)
- Questions and concerns processed similar to 1994 BVPS OSTI
- Follow-up of outstanding concerns during the assessment
- Tracking of all concerns requiring corrective action (CTS)
- Follow-up and closure of concerns by responsible departments confirmed by Quality Services Unit

QUESTION/CONCERN RESOLUTION



TENTATIVE SCHEDULE

- WEEK 1 (6/20/94) - Team Leader assembles documentation, arranges work location for team, notifies site.
- WEEK 2 (6/27/94) - Team Leader conducts orientation and training with assessment team and assigns areas for review. Team reviews documentation and develops individual review plans based on SWOPI checklist.
- WEEK 3 (7/5/94) - Entire team meets for entrance meeting, walk downs and personnel interviews, and starts documentation review.
- WEEK 4 (7/11/94) - Assessment activities continue. Review outstanding questions/concerns from week #3.

TENTATIVE SCHEDULE

(continued)

WEEK 5 (7/18/94) - Review of assessment documentation continues.

WEEK 6 (7/25/94) - Assessment activities continue and summary conclusions made. Tentative exit meeting with plant management/NRC on Friday (7/29/94).

WEEK 7 (8/1/94) - Team compiles assessment results and prepares report.

WEEK 8 (8/8/94) - Team leader edits report and presents to DLC management for review.

Final report issued by September 2, 1994.

REVIEW TEAM

- 8 Qualified, Experienced Technical Reviewers
- Assigned Full Time During Assessment
- Remain Independent of Response Team/
Open Item Resolutions

Experience Requirements:

- Minimum 10 years nuclear experience
- Minimum 5 years specific review area experience