

JUN 8 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 CHANGE REVIEW

References: Letter dated April 8, 1994, from J. D. Sieber to U. S. Nuclear Regulatory Commission, transmitting Beaver Valley Power Station Units 1 and 2 Quality Assurance Program Requirements, Revision 6, Updated FSAR; NRC: QA94-12, TACU00812

We have reviewed your proposed change to the quality assurance program, Revision 6, which would extend the maximum allowable time period, between reviews of safety-related plant procedures, from two to six years. You assert that the time extension between reviews would be supported by the fact that the plants will be subject to programmatic controls, which implement the necessary process for feedback update and revision, and is provided for by existing plant administrative procedures and the requirement for a maximum six-year procedure review. Administrative controls are clearly annotated in the Nuclear Power Division Directives and supported by the technical input from the Independent Safety Evaluation Group.

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Mr. J. D. Sieber

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The staff cannot accept the revised Quality Assurance Program. The staff is concerned that the feedback, which would be required to effect timely changes, would not occur in a timely and concise manner. The staff would reconsider the extended review period if you could provide examples of the timeliness of procedural changes necessitated by events or deficiencies.

Sincerely,

Original Signed [Signature]

Michael C. Modes, Chief
Materials Section
Division of Reactor Safety

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
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NRC Resident Inspector
Commonwealth of Pennsylvania
State of Ohio

Mr. J. D. Sieber

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JUN 8 1994

bcc w/encl:

Region I Docket Room (with concurrences)

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DRS Files (2)

RI:DRS

Kaplan

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RI:DRS

Modes

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Duquesne Light Company

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

10 CFR 50.54(a)(3)(ii)

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

April 8, 1994

(412) 393-5255
Fax (412) 643-8069

JUN - 1 REC'D MZ
QA94-12

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
Quality Assurance Program Description Change

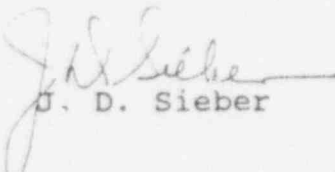
In accordance with 10 CFR 50.54(a)(3), this letter forwards, for NRC approval, a proposed change to the quality assurance program description included in the Safety Analysis Report. The change would extend the maximum allowable time period between reviews of safety related plant procedures from 2 years to 6 years. This proposed change is described in Attachments 1 and 2.

Attachment 1 describes the proposed changes, the reason for the changes, and provides the basis for concluding that the revised program incorporating these changes continues to satisfy the criteria of 10 CFR 50, Appendix B.

Attachment 2 identifies the changes to the Quality Assurance Program Description as described in the Unit 1 and Unit 2 Updated Final Safety Analysis Reports.

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

Sincerely,


J. D. Sieber

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

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1997
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10 CFR 50.54(a) EVALUATION OF
QUALITY ASSURANCE PROGRAM DESCRIPTION CHANGE

Identification of the Change

The biennial review of safety related plant procedures required by ANSI N18.7 would be replaced by existing programmatic controls provided in plant administrative procedures and by a maximum review period of six years. The changes will affect Unit 1 Updated Final Safety Analysis Report (UFSAR) Page 1.3-48 and Unit 2 UFSAR Table 1.8-1 (Pages 14 and 15).

Reason for the Change

Programmatic controls provided by existing plant administrative procedures and the addition of a maximum six year procedure review requirement are considered sufficient measures to ensure that safety related procedures are appropriate for the activities to be performed and obviate the need for a biennial procedure review. The pages that follow provide a description of the intended program implementation and existing programmatic controls contained in administrative procedures to ensure that procedures are reviewed and updated on a timely basis.

Basis for Concluding That the Revised Program Incorporating This Change Continues to Satisfy the Criteria of 10 CFR 50, Appendix B

The revised UFSAR will require a maximum six year review period and will continue to conform to the requirements of 10 CFR 50 Appendix B since the existing programmatic controls provide assurance that activities affecting the quality of safety related structures, systems, and components will be performed to an extent consistent with their importance to safety. Specifically, Sections 17.2.5 and 17.2.6 in the BVPS-2 UFSAR QA Program description remain unchanged. The proposed change provides an alternative method for ensuring that procedures remain current and appropriate for the circumstances.

PROGRAMMATIC CONTROLS

Individual units, departments, and sections will have the option of performing reviews of their plant procedures at a frequency they deem appropriate. However, a maximum six year review period will be imposed in lieu of the biennial review. The biennial review is no longer considered necessary since existing controls and the maximum six year review period provide assurance that procedures will be reviewed and updated.

The following paragraphs describe some of the programmatic controls that are contained within existing plant directives and administrative procedures. These excerpts illustrate the controls provided to ensure that procedures are reviewed and updated on timely bases.

Unit, department, and section administrative procedures shall contain the instructions necessary to implement the requirements of the upper tier documents; that is, 10 CFR, Updated Final Safety Analysis Report (UFSAR), Technical Specifications, and Licenses. (This control is contained in Nuclear Power Division Administrative Manual [NPDAM] Procedure 2.3, Revision 5.)

Unit, department, section, and subsection heads shall ensure that activities are governed by written procedures which comply with the requirements of the Quality Assurance Program for their specific areas of responsibility. (This control is contained in NPDAM Directive 1.8.1, Revision 1.)

The implementation of the Inservice Inspection Program shall include provisions to review and update the program periodically to assure that design changes, modifications, and any changes necessitated by changes in regulatory requirements are factored into the program. (This control is contained in NPDAM Directive 1.8.3, Revision 2.)

The Independent Safety Evaluation Group (ISEG) shall function to examine unit operating characteristics, NRC correspondence, industry advisories, Licensee Event Reports, and other sources of information on unit design and operating experience which may identify areas for improving unit safety and reliability. The ISEG shall make detailed recommendations to the Nuclear Power Division management on means to improve unit safety and reliability including equipment modifications, procedure revisions, maintenance activities, and operation activities. If not otherwise implemented, all recommendations shall then be made to the Senior Vice President, Nuclear Power Division. (These controls are contained in NPDAM Directive 1.8.5, Revision 0.)

PROGRAMMATIC CONTROLS (Continued)

The fire protection program and implementing procedures shall be reviewed/inspected/audited as follows:

- a) Once every 24 months by the Quality Services Unit.
- b) Once every 12 months by either qualified offsite licensee personnel, an outside fire protection firm, Quality Services Unit, or American Nuclear Insurers (ANI).
- c) Once every 36 months by a qualified outside fire consultant or ANI.

(These controls are contained in NPDAM Procedure 3.5, Revision 2.)

Industry and Vendor correspondence received by Nuclear Power Division personnel shall be forwarded for review to the responsible supervisor or group. The reviewer shall determine if action is required, and document the review. Potential actions include: (a) warnings, (b) revision of procedures affected by the changes, (c) revision of equipment technical manuals or update of vendor technical information files, (d) changes to training programs and/or the BVPS Emergency Plan and Implementing Procedures, and (e) improvements in the safety or efficiency of plant operations. A secondary review is also performed. (These controls are contained in NPDAM Procedure 6.2, Revision 1.)

Nuclear Power Division personnel who identify a need for vendor technical information changes due to new or revised information shall prepare and submit a Vendor Documentation Transmittal Form, with support information, to the Engineering Management Services Supervisor for subsequent review and approval. (This control is contained in NPDAM Procedure 6.4, Revision 2.)

Nuclear Power Division Managers shall ensure that plant configuration documents under their jurisdiction are updated to reflect any changes which may result from the issuance of new or revised vendor technical information. (This control is contained in NPDAM Procedure 6.4, Revision 2.)

Procedures shall be revised to meet newly approved technical specification requirements. (This control is contained in NPDAM Procedure 7.1, Revision 2.)

Nuclear Power Division personnel performing, preparing, or revising procedures to satisfy technical specifications surveillances are responsible for identifying inconsistencies or errors and notifying the Nuclear Safety Department for changes to the technical specifications or matrix. (This control is contained in NPDAM Procedure 7.1, Revision 2.)

PROGRAMMATIC CONTROLS (Continued)

New surveillance testing requirements (or revised ones) will be incorporated into procedures, programs, or administrative controls. (This control is contained in NPDAM Procedure 7.1, Revision 2.)

Administrative changes may be identified through station modification requests or other specific requests as noted below:

- a) Changes to the operating manual or operating procedures should be made using an Operating Manual Deficiency Report (OMDR).
- b) Changes to the Valve Operating Number Diagrams (VOND's) should be made using a VOND Deficiency Report (VDR).
- c) Changes to Maintenance or I&C procedures should be made using a Procedure Change Request.
- d) Other types of document changes should be requested using a Document Deficiency Report.

(These controls are contained in NPDAM Procedure 7.8, Revision 1.)

Supervisors perform surveillances using the "Procedure Adherence/Adequacy Surveillance" form. Adequate corrective action is then initiated for any deficient procedures. (This control is contained in NPDAM Procedure 8.1, Revision 1.)

Design Change Packages (DCPs) are reviewed by the Nuclear Engineering Department to determine if the change affects Code equipment, and could require a revision to the Inservice Test Program. (This control is contained in NPDAM Procedure 8.2, Revision 3.)

Reviews of the Configuration Baseline and associated databases assure that design requirements are current and accurate, and changes are recorded in a timely manner in all affected documents including procedures and databases. (This control is contained in NPDAM Procedure 8.6, Revision 0.)

PROGRAMMATIC CONTROLS (Continued)

Support Organizations (Operations, Procedures, Maintenance, Testing & Plant Performance) are responsible for reviewing setpoint change technical evaluations, and revising existing programs/procedures to include new/revised setpoint information. (This control is contained in NPDAM Procedure 8.7, Revision 1.)

The following groups have responsibilities concerning the Electrical Equipment Qualification Master List (EEQML): Nuclear Engineering Department, Licensing, Onsite Safety Committee, Quality Services, Nuclear Procurement, Operations Assessment Department, Maintenance, and Maintenance Planning & Administration. Maintenance Planning & Administration is responsible for incorporating equipment qualification requirements in maintenance and surveillance procedures. (These controls are contained in NPDAM Procedure 8.9, Revision 1.)

Nonconformances and Quality Assurance Program implementation deficiencies are identified in audits, surveillances, inspections, Quality Services deficiency reports, or corrective action requests. Some of these would result in procedure changes. (This control is contained in NPDAM Procedure 8.21, Revision 2.)

Immediately prior to performing an "Infrequently Performed Test and Evolution" (IPTE), the responsible test manager shall ensure the procedure remains adequate as written. (This control is contained in NPDAM Procedure 8.23, Revision 1.)

of the welds. The sample size shall be 10 percent of the welds in the system or component. If any of these weld samples are defective, that is, fail to pass bend tests as prescribed by ASME Code, Section IX, all remaining welds shall be sampled and all defective welds shall be removed and replaced."

1.3.3.32 Use of IEEE STD-308-1971 "Criteria for Class 1E Electric Systems for Nuclear Power Generating Stations" (Safety Guide 32)

Class 1E electric systems, to the greatest extent possible, comply with Safety Guide 32.

Availability of offsite power is discussed in Appendix 1A.17.

The capacity of each battery charger supply is based on the largest combined demands of the various steady state loads and the charging capacity to restore the battery to the fully charged state, irrespective of the status of the plant during which these demands occur.

1.3.3.33 Quality Assurance Program Requirements (Operation) (Safety Guide 33)

BVPS-1 has formed a Quality Assurance Department. This department is responsible for the administration of the operational quality assurance program.

The BVPS-1 Quality Assurance Manual has been revised to incorporate quality assurance for operations. This program complies with AEC Safety Guide 33. ANSI N45.2 and ANSI N18.7⁽⁹⁾ (previously ANS 3.2) requirements are referenced within Safety Guide 33.

BVPS-1 Quality Control is responsible for the preparation of the quality control procedures necessary to comply with Safety Guide 33.

1.3.4 Guidelines Used for the Duquesne Light Company Operations Quality Assurance Program

1.3.4.1 Regulatory Guides

REGULATORY GUIDE 1.33, NOVEMBER 3, 1972: QUALITY ASSURANCE PROGRAM REQUIREMENTS (OPERATIONS)

The Duquesne Light Company Operations Quality Assurance Program requirements follow the guidance of Regulatory Guide 1.33, November 3, 1972 [including referenced standards ANSI N45.2, 1971 and ANSI N18.7, 1972 (formerly ANS 3.2)]. The biennial review of safety related plant procedures described in ANSI N18.7 will be replaced by programmatic controls related to procedure review found in plant administrative procedures, and a maximum six year procedure review period.

BVPS-2 UFSAR

TABLE 1.8-1 (Cont)

Following the guidance of any of the preceding document revisions was based primarily on the revision in effect on the date of the last specification revision wherein the regulatory guide was invoked. Since each revision of the regulatory guide is less restrictive than the foregoing, following the guidance of any of the revisions is considered acceptable.

RG No. 1.32, Rev. 2

UFSAR Reference Sections 7.5, 8.1.5, 8.2, 8.3.1, 8.3.2, 7.5.2.3.1.3

CRITERIA FOR SAFETY-RELATED ELECTRIC POWER SYSTEMS FOR NUCLEAR POWER PLANTS (FEBRUARY 1977)

The design of the safety-related electric power systems for Beaver Valley Power Station - Unit 2 (BVPS-2) follows IEEE Standard 308-1974, and the guidance of Regulatory Guide 1.32, with the following clarifications:

Two immediate access offsite power circuits are provided. Each circuit is designed to be immediately available following a loss of onsite alternating current power supplies so that sufficient power capacity remains for an orderly shutdown and to supply all train related engineered safety feature loads:

Each battery charger that supplies Class IE 125 V dc systems is designed with full capacity and capability to supply the largest combined demands of the various steady state loads while simultaneously providing sufficient power for adequate charging capacity to restore the battery from the design minimum charged state to the charged state irrespective of the BVPS-2 status during which these demands occur.

For test methods, procedures, and intervals for all Class IE battery performance discharge and service tests, refer to the position on Regulatory Guide 1.129.

RG No. 1.33, Rev. 2

UFSAR Reference Sections 13.4, 13.5, 17.2

QUALITY ASSURANCE PROGRAM REQUIREMENTS (OPERATION) (FEBRUARY 1978)

The Quality Assurance Program for the operating phase of Beaver Valley Power Station - Unit 2 will follow the guidance of this regulatory guide with the following clarification of Paragraph C.2, and alternative to the biennial review described in ANSI N18.7.

Paragraph C.2

The applicability of the referenced regulatory guides (1.8, 1.17, 1.28, 1.30, 1.37, 1.38, 1.39, 1.54, 1.58, 1.64, 1.74, 1.88, 1.94,

EVPS-2 UFSAR

TABLE 1.8-1 (Cont)

1.116, and 1.123) is as stated in the respective positions on these regulatory guides.

Alternative To Biennial Review

The biennial review of safety related plant procedures described in ANSI N18.7 will be replaced by programmatic controls related to procedure review found in plant administrative procedures, and a maximum six year procedure review period.

RG No. 1.34, Rev. 0

UFSAR Reference Section 5.2.3

CONTROL OF ELECTROSLAG WELD PROPERTIES (DECEMBER 28, 1972)

The guidance provided by this regulatory guide regarding control of electroslag weld properties was followed for fabrication of applicable components for Beaver Valley Power Station - Unit 2.

RG No. 1.35, Rev. 2

INSERVICE INSPECTION OF UNGROUTED TENDONS IN PRESTRESSED CONCRETE CONTAINMENT STRUCTURES (JANUARY 1976)

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

RG No. 1.36, Rev. 0

UFSAR Reference Sections 5.2.3, 6.1.1

NONMETALLIC THERMAL INSULATION FOR AUSTENITIC STAINLESS STEEL (FEBRUARY 23, 1973)

Nonmetallic thermal insulation for austenitic stainless steel used at Beaver Valley Power Station - Unit 2 meets the intent of this regulatory guide. As an alternative to controlled packaging and shipping described in Paragraph C.1, receipt inspection and tests are required by specification. This testing and inspection consists of visual inspection for physical or water damage to all cartons. Damaged cartons are segregated. Potentially contaminated insulation is not accepted, unless randomly selected samples from each carton are shown to be acceptable after being resubjected to the production test outlined in this regulatory guide.