



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

Docket  
File

March 30, 1992

Docket Nos. 50-334  
and 30-412  
Serial No. BV-92-020

Mr. J. D. Sieber, Vice President  
Nuclear Group  
Duquesne Light Company  
Post Office Box 4  
Shippingport, Pennsylvania 15077-0004

Dear Mr. Sieber:

SUBJECT: FINAL SAFETY ANALYSIS REPORT UPDATE: FACT-FINDING VISIT -  
BEAVER VALLEY POWER STATION, UNITS 1 AND 2

In November 1991, the Commission directed the staff to determine how licensees are responding to the requirement of 10 CFR 50.71 for annual updates to the Final Safety Analysis Report (FSAR), and to determine whether and how the annual updates to the FSAR fall short of describing the facility's current licensing basis (CLB). Although set out in 10 CFR Part 54, the staff will utilize the definition of CLB from 10 CFR 54.3. That definition represents the staff's understanding of the scope of the CLB, and it should be applicable to all reactor licensees.

The staff plans to accomplish the Commission's directive by conducting fact-finding visits to a number of power stations deemed to represent a cross section of the industry. Our selection of plants includes those that were licensed from 1970 through 1987, all reactor-vendor types, and plants from all NRC regions. Some of the selected plants are known to have computerized systems for tracking commitments.

To accomplish our objectives, our fact-finding discussions of the plant-specific programs for updating the FSAR will be directed to following the resolution of preselected issues through the update process. We would also like to take advantage of our visit to your facility to observe whatever systems you employ to track commitments, search data for CLB type information, or record your FSAR for easy update, search, and/or retrieval.

We have chosen a number of issues which have come about either as the result of new regulations or staff interpretations of regulations so that the licensing basis for plants was expanded or further defined. Some or all of the issues required facility modifications or additions which may be described in the FSAR. For the fact-finding visits, we will not be concerned with the technical adequacy of the issue. Our objective is to understand your methodology and processes for updating the FSAR so that we will be able to advise the Commission on industry practices.

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For the Beaver Valley Power Station, we have chosen the following issues for discussion:

- 1) Improved Monitoring Instrumentation to follow the course of an accident - Regulatory Guide 1.97,
- 2) Generic Letter 83-26, Item 4.3 - Reactor Trip System Reliability - Design Modifications (Automatic Actuation of Shunt Trip Attachment for Westinghouse and B&W Plants),
- 3) Reactor Pressure Vessel Level Instrumentation, NUREG 0730 Item JT.F.2.4, Installation of Instrumentation to Detect Inadequate Core Cooling, and
- 4) Unresolved Safety Issue A-09, ATWS - AMSAC Instrumentation.

We will bring initiating documents such as generic letters with us, but it is requested that you have available for discussion your updated responses to the identified concerns, our acceptance letters, and inspection reports that form the CLB for the issues. Also, you should have available any other docketed correspondence that modified the CLB for that issue through new commitments, e.g., response to an enforcement action or licensee event report. We can then follow the process from initiation through implementation and the latest FSAR update. In addition, it is requested that you identify one issue from your last FSAR update that included new licensing basis and/or plant modifications and be able to show how your latest update was accomplished.

The staff has committed to report to the Commission about June 1992. With your cooperation and assistance as outlined above, we believe that we can provide the Commission an accurate representation of industry practice on FSAR updates and their relation to the CLB.

I have discussed our fact-finding plans with Mr. Nelson Tonet. We would like to meet with your staff who are responsible for FSAR updates on April 7, 1992. We believe approximately one half day should be required to obtain the information on the FSAR update process; the remaining time that day can be spent on discussions and demonstrations of your systems to track or retrieve the CLB type information. Please let me know if this schedule is not acceptable.

The Commission in its November 1991, directive to the staff also established a pilot program for voluntary participation by licensees to compile their CLB. On March 19, 1992, NRC issued Generic Letter 92-03 on this subject. We will be glad to answer questions on the generic letter during our visit, however, our visit should not be construed as soliciting participation in the pilot program.

Mr: J. D. Sieber

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The objective of our request is to determine the facts about FSAR updates and to obtain information on your current licensing basis tracking and documentation systems. This is not a request for submittal of information, and no new information is to be developed for our discussions. The information that we requested be made available for the discussion should be readily accessible from your files. Therefore, the requirements of P.L. 96-511 do not apply.

Any questions you may have about this request may be addressed to me or to Mr. Dave Wigginton at (301) 504-1301.

Sincerely,

/s/

Albert W. De Agazio, Sr. Project Manager  
Project Directorate I-4  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

cc: See next page

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Duquesne Light Company

Beaver Valley Power Station  
Units 1 & 2

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