

October 6, 1995

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

SUBJECT: ALTERNATIVE TO SAFETY SYSTEM FUNCTIONAL (SSFI) INSPECTION AT  
BEAVER VALLEY

Dear Mr. Cross:

This letter is in response to your request to perform a self-assessment as an alternative to an SSFI conducted by the Nuclear Regulatory Commission (NRC). The SSFI had been a recommendation of the NRC's SALP Board for Beaver Valley, and was proposed as an NRC team in Enclosure 2 to the SALP report issued on July 21, 1995. In a meeting held on September 25, 1995, with NRC representatives, your staff discussed the details of the proposed SSFI of the safety injection system, which was submitted by letter on September 20, 1995. Qualifications of the self-assessment team members were also discussed.

Based on our review, we have concluded that your self-assessment plan is acceptable in lieu of an NRC team conducted in accordance with Inspection Procedure 93801. This acceptance is contingent upon: (1) the NRC in-process inspections of your effort, and (2) issuance of a final report, which the NRC would review as part of future inspection activities. We would also request that you formally present the results of your self-assessment to the NRC at a later date.

Questions regarding your conduct of a self-assessment or the NRC's intended oversight may be directed to Mr. Eugene M. Kelly at (610) 337-5111. Your cooperation with us in this matter is appreciated.

Sincerely,

*Original Signed By:*

A. Randolph Blough, Acting Deputy Director  
Division of Reactor Safety

Docket Nos. 50-334; 50-412

Enclosures:

1. Meeting Attendees
2. Duquesne Light Company Presentation

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*JEV*

Mr. J. E. Cross

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cc w/encl:

G. S. Thomas, Vice President, Nuclear Services  
T. P. Noonan, 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  
M. Clancy, Mayor  
D. Screnci, PAO (2)  
NRC Resident Inspector  
Commonwealth of Pennsylvania  
State of Ohio

Mr. J. E. Cross

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Distribution w/encl:

Region I Docket Room (with concurrences)

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Inspection Program Branch, NRR (IPAS)

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OFFICE	RI/DRS	RI/DRP	RI/DRS	E	RI/	RI/
NAME	BWhitacre	PEselgroth	EKelly			
DATE	10/06/95	10/06/95	10/06/95		10/ /95	10/ /95

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ENCLOSURE 1

NRC/Duquesne Light Meeting September 25, 10:00 a.m.

Duquesne Light Company

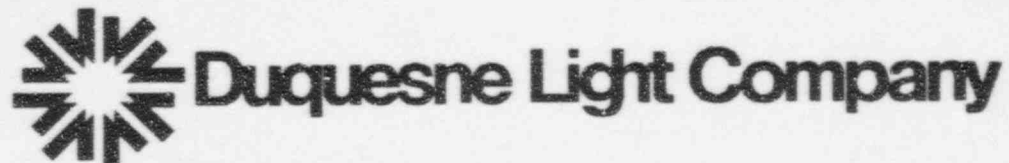
T. Noonan	Division Vice President, Nuclear Ops/Plant Manager
R. Brosi	Manager, EP
T. Zyra	Supervisor, Engineering Assurance
N. Tonet	Manager, Nuclear Safety
G. Thomas	Division Vice President, Nuclear Services

U.S. Nuclear Regulatory Commission

A. Blough	Acting Deputy Director, Division of Reactor Safety (DRS)
E. Kelly	Chief, Systems Engineering Branch, DRS
P. Eselgroth	Chief, Projects Branch 7, Division of Reactor Projects
D. Brinkman	Project Manager - Beaver Valley, PDI-2, NRR

Pennsylvania State

M. Murphy	Principal Engineer, Department of Environmental Protection
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Beaver Valley Power Station

Unit 1

***Safety Injection System  
Safety System Functional Inspection (SSFI)***

***NRC Presentation  
September 25, 1995***



## *Attendees:*

J. E. Cross	Senior Vice President, C.N.O.
G. S. Thomas	Vice President, Nuclear Services
N. R. Tonet	Manager, Nuclear Safety
R. K. Brosi	Manager, Emergency Preparedness
T. G. Zyra	Supervisor, Engineering Assurance

# *Agenda*

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I. BACKGROUND	R. BROSI
II. KEYS FOR SUCCESS	R. BROSI
III. PURPOSE & SCOPE	T.G. ZYRA
IV. INSPECTION TEAM	T.G. ZYRA
V. INSPECTION PROCESS	T.G. ZYRA
VI. SCHEDULE	T.G. ZYRA
VII. SUMMARY	G.S. THOMAS

# *Background*

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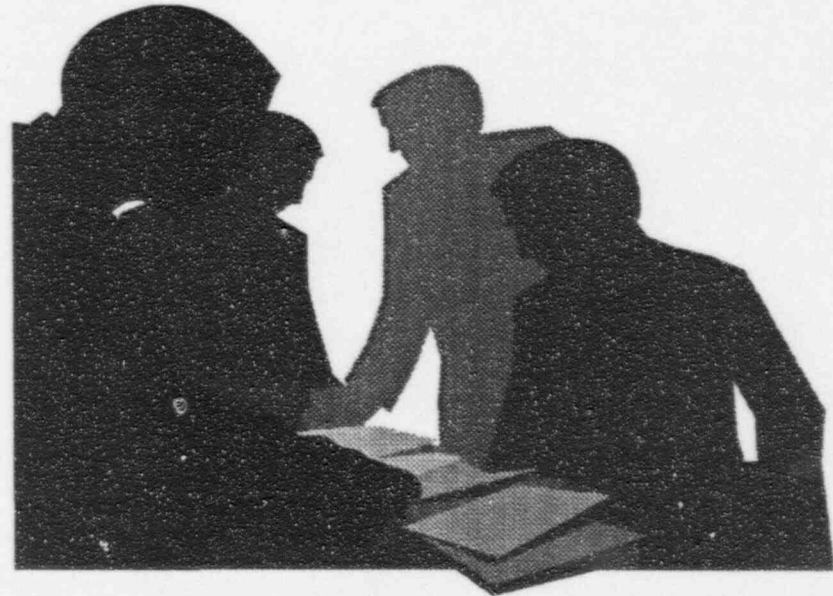
- ◆ NRC has identified that Licensee Proposals for Self-Assessments are encouraged.
- ◆ Beaver Valley Power Station created the SSFE Process at the time NRC created SSFIs (1987).
- ◆ Eight systems at BVPS-1 reviewed by SSFE process.
- ◆ Performed SWOPI (1994) - Lessons Learned Applied to this inspection Plan.



# *Keys for Success*

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- ◆ Management Involvement
- ◆ Critical Self Assessment  
with In-Depth Questioning  
Attitude
- ◆ Objectivity and  
Independence
- ◆ Organizational  
Responsiveness



# *Inspection Plan*

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- ◆ PURPOSE
- ◆ SCOPE
- ◆ INSPECTION TEAM
- ◆ INSPECTION PROCESS
- ◆ SCHEDULE

# *Purpose*

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- ◆ Assess the Operational Performance Capability of the Unit 1 Safety Injection System.
- ◆ Verify the System is capable of conducting its Intended Safety Functions.
- ◆ Identify Program-Related Performance Deficiencies.
- ◆ Evaluate the Implications of Performance Deficiencies Identified.

# *Scope*

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## *Areas to be reviewed during the inspection:*

- ◆ Engineering Design & Configuration Control
- ◆ Operations
- ◆ Maintenance
- ◆ Surveillance and Testing
- ◆ Quality Assurance & Corrective Actions

# *Inspection Team*

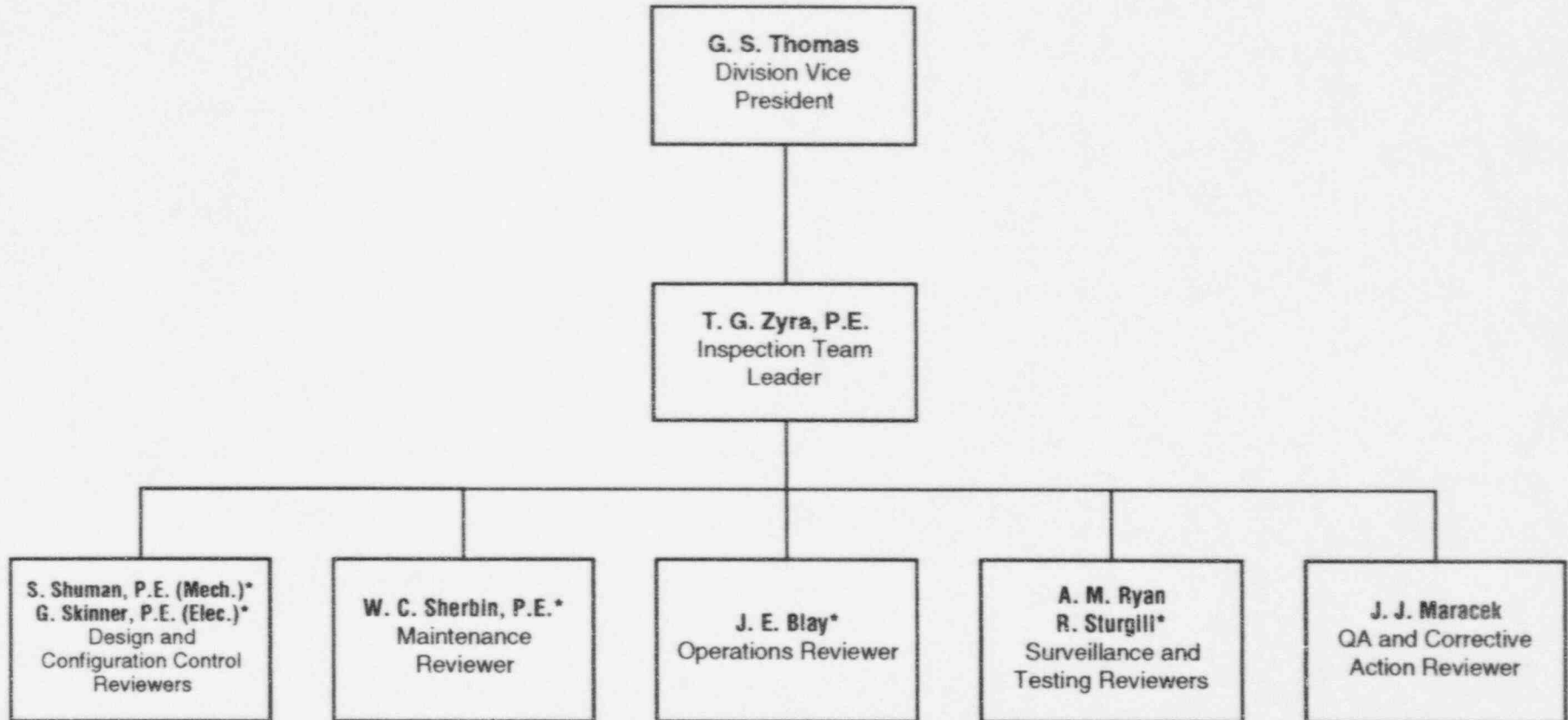
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- ◆ Eight Qualified, Experienced Technical Reviewers.
- ◆ Assigned Full Time Inspection Responsibilities.
- ◆ Reviewers are Independent from Responding Organizations.

# Unit 1 Safety Injection SSFI Organization

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## SSFI Organization



\*Consultant or External Utility Team Member Assigned to Review Inspection Area

# *Inspection Process*

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## *In accordance with the Approved Plan:*

- ◆ Team Orientation & Training including Lessons Learned from prior Self-Assessments.
- ◆ Use of Area Checklists Based on NRC Inspection Procedure 93801.
- ◆ Daily Team and BVPS Interface Meetings.
- ◆ Quality Services Over View of Inspection Plan

## ***Inspection Process (continued)***

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- ◆ Conduct System Walkdowns
- ◆ Perform Analytical and Design Reviews
- ◆ Perform Documentation/Record Reviews
- ◆ Interview Cognizant Personnel
- ◆ Open Item Tracking through CTS
- ◆ Follow-up and Closure of Open Items  
Confirmed by Quality Services



# *Schedule*

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**Week 1 (10/16/95)** Team Leader conducts orientation and training with assessment team and assigns review areas. Team reviews documentation and develops individual review plans based on checklist.

**Week 2 (10/23/95)** Entrance meeting conducted, system walkdown, interviews and documentation reviews by the team begin.

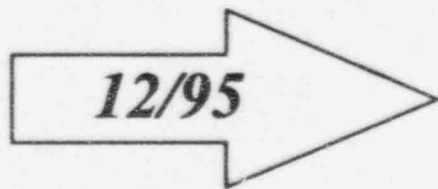
**Week 3 (10/30/95)** Inspection activities continue. Unresolved questions and concerns identified are tracked.

## *Schedule (continued)*

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**Week 4 (11/06/95)** Inspection activities continue.  
Summary conclusions developed.  
Exit meeting conducted.

**Week 5 (11/13/95)** Team compiles inspection results  
and begins preparation of the draft  
report.



Final report issued