Duquesne Light

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July 26, 1984

Director of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Mr. D. G. Eisenhut, Director
Division of Licensing

REFERENCE: Beaver Valley Power Station Unit No. 2
Docket No. 50-~~412~~ 412
Generic Letter 82-33; Procedures Generation
Package for Emergency Operating Procedures

Gentlemen:

In accordance with Beaver Valley Power Station Unit 2 (BVPS-2) submittal Reference (a) in response to Generic Letter 82-33, BVPS-2 is submitting a Procedures Generation Package (PGP) (Attachment 1) which describes the methods for developing and implementing function oriented Emergency Operating Procedures (EOPs). These EOPs are based on the re-analysis of transients and accidents described and clarified in Item I.C.1 of NUREG-0737 and the Westinghouse Generic Emergency Response Guidelines (ERGs), Rev. 1, and associated background documents. Duquesne Light Company participated with the Westinghouse Owners Group during the re-analysis of transients and accidents and the development of the generic ERGs. It is BVPS-2's intent to follow these generic guidelines as closely as possible in order to take full credit for the analysis effort, the human factors principles applied, and the function and task analysis effort which has formed the basis for the operator information and control needs. All programs are described in detail in this submittal.

At present, the EOP development status and schedule is as follows. The 48 EOP preliminary drafts and background documents will be completed by August 1, 1984. The first iteration of the BVPS-2 EOP verification will be conducted on those procedures which have been revised to match BVPS-1 EOPs after their initial verification. In parallel with this task, the BVPS-2 Control Room Design Review Team will complete a task analysis of the EOP preliminary drafts to determine the characteristics of needed instrumentation and controls. When all BVPS-2 EOPS have been through these processes, a table-top validation and control room walk-through validation will occur. The BVPS-1 plant specific simulator will be used to validate the BVPS-1 EOPs. For dual licensing purposes, the BVPS-1 and BVPS-2 EOPs have been made very similar. Any differences between BVPS-1/BVPS-2 EOPs will be

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table-top and control room walk-through validated since BVPS-2 does not have a plant specific simulator. An iterative process will follow, where necessary, which will resolve EOP discrepancies identified during the described verification and validation phases.

Through this stage of EOP development, there have not been any deviations from the ERGs identified as having safety significance. If any significant deviations are identified, they will be submitted under separate cover in accordance with the PGP. All deviations from the ERGs are documented and are available for NRC review at the site. Clarification of what constitutes a deviation having safety significance from one which does not was obtained from the NRC. BVPS-2's understanding of this classification is documented in Reference (b) and has served as BVPS-2's basis for evaluating deviations.

Included with this submittal is Attachment 1, "Procedures Generation Package for Beaver Valley Power Station, Unit 2," which describes the methods utilized in preparing EOPs from the generic ERGs. Section 3 of Attachment 1 has been drafted as a preliminary issue for incorporation into the Station Operating Manual and provides the administrative controls necessary for maintaining the EOPs after implementation. This section will receive additional reviews and is subject to revision following this submittal. However, the intent of Section 3 will not change and it is included in this submittal for your review.

This PGP is being sent for the NRC to review as committed in Reference (a) in sufficient time to permit resolution of any NRC concerns in a timely fashion so as to not adversely impact operator training.

DUQUESNE LIGHT COMPANY

SUBSCRIBED AND SWORN TO BEFORE ME THIS
26th DAY OF July, 1984.

Anita Elaine Reiter
Notary Public

By E. J. Woolever
E. J. Woolever
Vice President

ANITA ELAINE REITER, NOTARY PUBLIC
ROBINSON TOWNSHIP, ALLEGHENY COUNTY
MY COMMISSION EXPIRES OCTOBER 20, 1986

SDH/nml
Attachment

REFERENCES: (a) 2NRC-3-017, dated 4-15-83
(b) March 14, 1984, Mr. Carey to Mr. Vargo, Documentation of conference call to obtain clarification on the identification of significant deviations from Generic Technical Guidelines

cc: Ms. M. Ley, Project Manager (w/a)
Mr. E. A. Licitra, Project Manager (w/a)
Mr. G. Walton, NRC Resident Inspector (w/a)
NRC Document Control Desk (w/a)

COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF ALLEGHENY)

On this 26th day of July, 1984, before me, a Notary Public in and for said Commonwealth and County, personally appeared E. J. Woolever, who being duly sworn, deposed and said that (1) he is Vice President of Duquesne Light, (2) he is duly authorized to execute and file the foregoing Submittal on behalf of said Company, and (3) the statements set forth in the Submittal are true and correct to the best of his knowledge.

Anita Elaine Reiter
Notary Public

ANITA ELAINE REITER, NOTARY PUBLIC
ROBINSON TOWNSHIP, ALLEGHENY COUNTY
MY COMMISSION EXPIRES OCTOBER 20, 1986