

Duquesne Light Company

Beaver Valley Power Station
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L-98-187

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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

**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
Revision of Reply to Notice of Violation EA 97-255**

Duquesne Light Company had previously provided a response to Notice of Violation EA 97-255 in letter L-97-001, dated August 1, 1997. This letter described various actions taken to prevent recurrence of not performing Technical Specification surveillance requirements within the specified time intervals.

This previous letter stated that the root cause of the violation was inadequate management control of the Technical Specification program, with contributing factors of weak procedures, scheduling, coordination and communication processes used for surveillance testing. Three corrective action commitments were provided.

This letter clarifies the last corrective action on how the control and coordination of Technical Specification surveillances has been implemented and interfaces with site programs. Prior to implementing these corrective actions, scheduling and control of Technical Specification surveillances was scattered throughout several site procedures and organizations without any overall program control defined. The scheduling and coordination requirements for Technical Specification surveillances is now centralized within the Nuclear Power Division Administrative Procedure (NPDAP) 8.12, "Control and Coordination of Technical Specification Surveillances." This site procedure places the responsibility on the Work Management Manager for coordination and on-line scheduling process for Technical Specification surveillances with durations of greater than or equal to one week. NPDAP 8.12 assigns the responsibility to individual department managers for the scheduling and tracking of all Technical Specification surveillance procedures within their department with durations less than one week (e.g., daily, per shift, etc.). NPDAP 8.12 places the responsibility on the Outage Management Manager for scheduling support for all Technical Specification surveillance procedures

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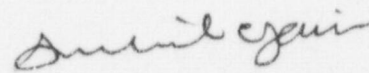
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with durations greater than or equal to one week to be performed within an outage schedule. Finally NPDAP 8.12 acknowledges that Inservice Inspection procedures required by Technical Specifications are performed in accordance with NPDAP 8.3, "Inservice Inspection."

Thus site procedure NPDAP 8.12 defines the central site responsibilities and administrative controls for the Technical Specification Surveillance Testing Program at Beaver Valley Power Station.

If there are any questions concerning this response, please contact Mr. S. H. Hobbs, Director Safety & Licensing at (412) 393-5203.

Sincerely,



Sushil C. Jain

c: Mr. D. S. Brinkman, Sr. Project Manager
Mr. D. M. Kern, Sr. Resident Inspector
Mr. H. J. Miller, NRC Region I Administrator