

Duquesne Light Company

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

SUSHIL C. JAIN
Senior Vice President
Nuclear Services
Nuclear Power Division

(412) 393-5512
Fax (724) 643-8069

September 21, 1998
L-98-189

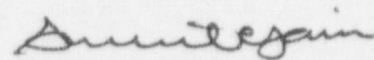
U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

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
Response to NRC Request for Information Dated August 6, 1998

Duquesne Light Company has reviewed your Request for Additional Information (RAI) dated August 6, 1998. This RAI requested information regarding a proposed transfer of warehouse quality control inspection responsibilities to the Nuclear Procurement Department.

Attachment 1 to this letter provides specific responses to each of your questions. Any further questions pertaining to this subject may be directed to Mr. Sam 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

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ATTACHMENT 1

Question 1:

As the "identification and providing the status of deficient materials" is a function being expunged from Quality Services Audit & Surveillance Activities:

- (a) where in the QAP description is such function being explicitly "captured"?
- (b) what is the impact of this re-alignment on the quality control inspection program responsibilities of the Quality Services Unit?
- (c) what additional oversight activities will the Quality Services Unit undertake to demonstrate the effective implementation of warehouse quality control inspections by the Nuclear Procurement organization?

Response:

- (a) Section 17.2.1 of the BVPS-2 UFSAR will be revised as described in Attachment 2.
- (b) Only the responsibility for the warehouse quality control inspection function will be transferred to the Nuclear Procurement Department. Quality Services will continue to be responsible for vendor related inspections, plant related inspections and NDE. The warehouse quality control inspection function will continue to be implemented under the quality assurance program.
- (c) The warehouse quality control inspection function will be audited as part of the material management audit which is currently performed biennially. This meets our commitment to ANSI N18.7 which requires that audits of selected aspects of operational phase activities shall be performed with a frequency commensurate with their safety significance and in such a manner as to assure that an audit of all safety related functions is completed within a two year period.

Question 2:

Since personnel currently performing warehouse quality control inspections (i.e., receipt inspections) must be qualified in accordance with ANSI N45.2.6, what would be the qualification requirements for personnel performing this function in the Nuclear Procurement organization? Where in the QAP is such qualification explicitly described?

Response:

Because our commitment to ANSI N45.2.6 applies to any personnel performing functions within the scope of the standard, qualification requirements for warehouse quality control inspectors will be unchanged as a result of transferring responsibilities between departments. Both BVPS-1 and BVPS-2 are committed to R.G. 1.58, Revision 1, September 1980 which endorses the ANSI standard. This commitment will remain as currently described in BVPS-1 UFSAR, Section 1.3.4, and BVPS-2 UFSAR, Section 1.8.

Question 3:

What is the impact of proposed organizational changes on Duquesne Light Company's commitments to RG 1.123, ANSI N45.2.13 and ANSI N45.2.6? Where in the QAP is this impact addressed?

Response:

Because our commitments to the cited regulatory guide and ANSI standards apply to any personnel performing functions within the scope of these documents, DLC's commitments will be unchanged as a result of transferring responsibilities between departments. These commitments will remain as currently described in BVPS-1 UFSAR, Section 1.3.4, and BVPS-2 UFSAR, Section 1.8.

17.2.1.1 Nuclear Power Division

The Nuclear Power Division is headed by the President Generation Group and Chief Nuclear Officer who reports to the President and Chief Executive Officer, Duquesne Light Company.

Reporting directly to the President Generation Group and Chief Nuclear Officer are the Division Vice President, Nuclear Operations Group & Plant Manager; the Sr. Vice President, Nuclear Services Group; the Division Vice President, Operations Support; the Assistant Vice President, Nuclear Human Resources Unit; the Manager Quality Services Unit; and the Offsite Review Committee. A line of communication is maintained with the Nuclear Controller.

Reporting to the Division Vice President Nuclear Operations Group & Plant Manager are the General Manager, Nuclear Operations Unit; the General Manager, Maintenance Programs Unit; the Manager, Health Physics Department; the Manager, Chemistry Department; the Manager, Nuclear Construction Department; a Technical Assistant and the Coordinator Onsite Safety Committee.

Reporting to the Sr. Vice President, Nuclear Services Group are the Director, Nuclear Safety and Licensing Department; the Manager, Nuclear Engineering; the Manager, Management Services Department; a Technical Assistant, and the Manager, System & Performance Engineering.

Reporting to the Division Vice President, Operations Support Group are the General Manager, Nuclear Support Unit; the Manager, Nuclear Procurement Department; the Director, Nuclear Communications; the Manager, Outage Management Department; the Manager, Nuclear Security; and the Manager, Procedures Upgrade Project. The Manager, Nuclear Procurement Department is responsible for the warehouse quality control inspection function.

Reporting to the Manager, Quality Services Unit are the Director, Quality Services Inspection & Examination; the Supervisor, Quality Data Assessment; three Quality Services Audit and Surveillance Supervisors; the Ombudsman; and the ORC Coordinator.

All quality-related activities of the Nuclear Power Division are documented by policies, directives, procedures, instructions, etc., of a type appropriate to the activity.

The quality-related activities of the Nuclear Operations Group, the Operations Support Group and the Nuclear Services Group are documented in written procedures or directives with guidance as necessary from the Quality Services Unit.

The Quality Services Unit is responsible for establishing, managing, and measuring the effectiveness of the Operations QA Program.

The Assistant Vice President, Nuclear Human Resources Unit maintains detailed job descriptions of principal Nuclear Power Division personnel.