



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

MAY 03 1983

MEMORANDUM FOR: Steven A. Varga, Chief
Operating Reactors Branch #1, DL

FROM: ~~Peter S. Tam~~ Project Manager
Operating Reactors Branch #1, DL

SUBJECT: NEGOTIATIONS WITH THE LICENSEE ON HIS RESPONSE TO
GENERIC LETTER 82-33 - BEAVER VALLEY UNIT 1

The licensee (Duquesne Light Company) provided his response to Generic Letter 82-33 on April 15, 1983. Subsequent to that, I have provided ORR#5 (W. Paulson) with a copy of his letter and a summary sheet.

On May 2, 1983, I had a meeting at the site with the licensee's representatives (K. Grada and S. Sovick) and the NRC Resident Inspector W. Troskoski. I was provided with background material and justifications for the licensee's April 15, 1983 response. I consider the licensee's proposed implementation dates, as stated in his April 15, 1983 letter, and as justified in the May 2 meeting, reasonable, logical and based on his overall projected events for the next few years. Therefore, unless I have been directed otherwise, I consider all the proposed implementation dates, summarized in the enclosure, acceptable. The Resident Inspector had no opposition to any proposed date.

Peter S. Tam

Peter S. Tam, Project Manager
Operating Reactors Branch #1
Division of Licensing

cc: W. Paulson
G. Dick
J. Lyons
J. Shea
W. Troskoski, Resident Inspector
at Beaver Valley

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PDR FOIA
GARDES-808 PDR

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Response
Item

4/15/85 letter

SPDS

- LV design purchased and being installed
- Requires two refueling outages to complete installation (3rd and 4th)
- Between 4th & 5th outage, plant operators will be trained. Training complete by 5th refueling outage.

• Did not request pre-implementation review since the LV design is used. The LV design is being reviewed by NRC.

CRDR

- Will follow guidance being developed by INPO. BU-1 program is being developed and will be very similar to the INPO plan
- 9/83 submit draft Program Plan
- Summary Report submittal date will be provided in the 9/83 Program Plan

5/2/83 Meeting

- 4th outage is tentatively scheduled in 2/85
- 5th outage is tentatively scheduled in late 1986 to early 1987. Schedule is uncertain since DCC plans to use fuel with extended burnup, upon NRC approval

- "Draft" means the Plan would change subject to NRC comment.
- Expect to submit Summary Report 24 months after start of CRDR. Since CRDR will start in 11/83, the Summary Report will be submitted in 11/85, assuming NRC has no major problems with the Program Plan.

Resp. NRC Item	4/15/83 Letter	5/2/83 Meeting
R.G. 1.97	<ul style="list-style-type: none"> • Review of compliance with R.G. 1.97 in progress. • The NUTAC on ERF will publish in 6/83 Guidelines for evaluating R.G. 1.97 instruments • Will be performed in parallel with CRDR • Final report on compliance will be submitted concurrently with CRDR Summary Report 	<p>—</p> <p>—</p> <p>—</p> <ul style="list-style-type: none"> • Approximately 11/85 (see discussion under CRDR)
ERF	<ul style="list-style-type: none"> • TSC will be fully functional after 4th refueling (requires <u>two</u> refueling outages to complete construction). After 3rd refueling outage, will be partly functional • Retracted alternate TSC commitment • OSC already functional • ERF will be fully functional after 4th refueling. After 3rd refueling, ERF functions will be related to permanent COF • Retracted backup ERF commitment 	<ul style="list-style-type: none"> • 3rd outage 6/83 - 5/83 • 4th outage 2/85 - 4/85 (tentative) • NRC staff is working on a Commission paper on this • (See TSC for approximate dates) • Depends on outcome of Commission Paper on this issue

Response
Item

4/15/83 Letter

EOPs

- New EOPs are being developed based on W Emergency Response Guidelines. NRC has yet to issue SER on these W Guidelines
- Procedures generation package to be submitted in 6/84 for NRC review
- Full implementation after completion of simulator validation and operator training

5/2/83 Meeting

- Current work is based on Rev. 0 of the Guidelines
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- It is logical to implement new EOPs after a refueling outage. The 4th one is too small. Thus full implementation would be after the 5th one (~ late 1986 to early 1987)

RECORD OF TELEPHONE CONVERSATION
BEAVER VALLEY UNIT 1

Date: August 6, 1982

Time: 2:00 p.m.

- Participants: S. Sovick (DLC)
 T. Vassello (DLC)
 P. Liang (SAI)
 R. Liner (SAI)
 P. Tam (NRC)

*Peter Tam
8/11/82*

Background

SAI, contractor to NRC on NUREG-0737 items I.A.2.1 and II.B.4, prepared a draft TER on these issues. The TER identified a number of open items to be resolved. Pages from the draft TER have been telecopied to DLC and the purpose of the conference call was to see how these may be resolved.

Discussion and Agreements

RE: P. 9, paragraph that reads "The Beaver Valley training program appears to does not believe training program meets this requirement..."

DLC stated that IE Inspection Report 81-29 (12/28/81) should clarify and close this item. P. Tam agreed to provide copy of the report to SAI.

RE: P. 9, Item A.2.e

DLC indicated that non-licensed instructors teach basic courses such as mathematics, physics, etc.; they do not get involved in subjects such as plant operation. They therefore do not need to go through a requalification program.

RE: P. 10, Item C.1

DLC pointed out that NRC does not have a document that gives the "80 hours core damage training" requirement. Furthermore, it really depends on how hours are added up. P. Tam will follow up with D. Wigginton to clarify this.*

*Follow up calls were made on August 9, 1982 ^{goal BT} involving S. Sovick, K. Grada, D. Wigginton and P. Tam. Wigginton explained that the "80 hours" requirement is considered by NRC to be the ~~absolute minimum~~ for core damage mitigation training. INPO has recommended 120-140 hours for the same training. It is, nevertheless, possible to count some hours in topics such as heat transfer, DNB, steam tables, etc. as hours in core damage mitigation training. S. Sovick requested to know what other utilities have claimed credit for. Wigginton informed him that reviews of Ginna and Zion are most near completion. Sovick will contact these utilities.

RE: P. 10, Item C.3

Requalification Program. See Item C.1 above.

RE: P.11, Item II.B.4

See Item C.1 above. DLC indicated IE INSpection Reports 81-18 and 82-05 should shed light on this. Copies will be provided SAI by P. Tam.



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Docket No. 50-334

AUG 29 1983

MEMORANDUM FOR: Darrell G. Eisenhut, Director, Division of Licensing, NRR

THRU: Steven A. Varga, Chief, Operating Reactors Branch No. 1, DL
Gus C. Lainas, Assistant Director for Operating Reactors,
Division of Licensing

FROM: Peter S. Tam, Project Manager, Operating Reactors Branch No. 1, DL

SUBJECT: BEAVER VALLEY UNIT 1 - NEGOTIATIONS WITH THE LICENSEE ON
NUREG-0737 ITEMS

Per direction provided in your July 12 and June 1, 1983 memoranda, I have documented the reasons for accepting the late implementation dates for the following items:

Safety Parameter Display System (SPDS) - G. Dick, LPM

Guidance provided states that "Without further negotiation, operability dates through December 31, 1985, are acceptable." The SPDS will be fully installed during the 4th refueling outage, tentatively scheduled to occur from 2/85 to 5/85. However, operators will not be trained by then; training will be done on the SPDS, and is scheduled to be completed during the 5th refueling outage, tentatively scheduled to occur in July 1986.

Since "operability" is defined as including completion of staff training, the licensee's proposed "operability" date would exceed the guidance provided. I discussed with the lead PM (June 15, 1983) and he agreed with me that even though the date exceeds the guideline, it is reasonable and is thus acceptable.

Emergency Operating Procedures - J. Lyons, Lead PM

Guidance provided states that "Without further negotiations, implementation of upgraded, human-factored, function-oriented EOPs through December 31, 1985, are acceptable." The licensee has proposed to implement the new EOPs after the 5th refueling outage, since the next one, the 4th, would be too soon for him. The 5th one is tentatively scheduled to occur in July 1986.

Since it is reasonable to implement new procedures at the beginning of a fuel cycle rather than at the middle, and since the proposed implementation date is

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less than 1 year beyond the guideline, I consider the licensee's date reasonable. I discussed with the Lead PM (June 15, 1983) and he agreed that the proposed date is acceptable.

Reg. Guide 1.97 - J. Shea, Lead PM

The licensee has committed to provide a report on his evaluation of R.G. 1.97 instrumentation in November 1985. The evaluation of such instrumentation is performed concurrently with CRDR, according to the licensee's integrated plan. It is reasonable to believe that complete implementation of R.G. 1.97 (defined by the licensee to include installation of equipment and staff trained) will not happen until some time after December 1985.

Complete implementation of this R.G. is contingent upon procurement, receipt and installation of a large number of pieces of equipment. Prior to all these, the licensee has to test, analyze and identify equipment to be replaced/upgraded. Thus the above date is a reasonable one and should be considered acceptable.

Peter S. Tam

Peter S. Tam, Project Manager
Operating Reactors Branch No. 1
Division of Licensing