



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

REGARDING PROPOSED REVISIONS TO THE
QUALITY ASSURANCE PROGRAM DESCRIPTION

DUQUESNE LIGHT COMPANY

OHIO EDISON COMPANY

PENNSYLVANIA POWER COMPANY

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

THE TOLEDO EDISON COMPANY

BEAVER VALLEY POWER STATION, UNIT NOS. 1 AND 2

DOCKET NOS. 50-334 AND 50-412

1.0 INTRODUCTION

By letter dated July 17, 1998 (Reference 1), as supplemented September 21, 1998 (Reference 2), Duquesne Light Company (DLC) submitted a request for approval of changes in the Quality Assurance (QA) organization described in Chapter 17.2 of the Beaver Valley Power Station, Unit No. 2, (BVPS-2) Updated Final Safety Analysis Report (UFSAR). The QA program description contained in the BVPS-2 UFSAR is applicable to both Beaver Valley Power Station, Unit No. 1 (BVPS-1) and BVPS-2. Specifically, DLC proposed to modify the QA organization to allow warehouse quality control inspectors to report to the Manager, Nuclear Procurement Department, rather than the Manager, Quality Services. These changes were submitted pursuant to 10 CFR 50.54(a)(3) as changes that reduced commitments in the QA program description previously approved by the NRC staff.

2.0 EVALUATION

In its July 17, 1998, submittal, DLC proposed that personnel performing quality control receiving inspections be reassigned from the Manager, Quality Services, to the Manager, Nuclear Procurement Department. Accordingly, the BVPS-2 UFSAR would be revised to reflect removal of the responsibility for identification and providing the status of deficient materials from the Director, Quality Services Audit and Surveillance.

As a result of this proposal, quality control receiving inspectors will be reassigned from the Manager, Quality Services, to the Manager, Nuclear Procurement Department, to improve the warehouse material control function. Quality functions assigned to these individuals will consist of inspection of received material for objective evidence of quality, identification of nonconforming material with hold tags to prevent inadvertent use or installation, and after resolution of the nonconformance, either acceptance or rejection of the material.

By letter dated August 6, 1998, the NRC staff sent a request for additional information (RAI) associated with DLC's proposed changes. As a result of this RAI, DLC supplemented its original submittal on September 21, 1998 (Reference 3), by proposing an additional UFSAR change to specify that the Manager, Nuclear Procurement Department, would be responsible for the warehouse quality control inspection function. Additionally, DLC provided the following clarifications:

- Quality Services will continue to be responsible for vendor-related inspections, plant-related inspections and NDE.
- The warehouse quality control inspection function will be audited as part of the material management audit which is currently performed biennially in accordance with DLC's commitment to ANSI N18.7, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants."
- Since both BVPS-1 and BVPS-2 remain committed to Regulatory Guide (RG) 1.58, "Qualification of Nuclear Power Plant Inspection, Examination, and Testing Personnel," Revision 1 (September 1980), qualification requirements for warehouse quality control inspectors will remain consistent with the provisions in ANSI N45.2.6-1978, "Qualifications of Inspection, Examination, and Testing Personnel for Nuclear Power Plants".
- All DLC's commitments to RG 1.123, "Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants," Revision 1, ANSI N45.2.6-1978, and ANSI Standard N45.2.13-1976, "Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants," will remain unchanged and their provisions will continue to apply to any personnel performing functions within the scope of these documents.

RG 1.123 conditionally endorses ANSI N45.2.13 as an acceptable method for complying with the requirements of Appendix B to 10 CFR Part 50 with regards to the control of procurement of items and services during the design, construction, and operations phases of a nuclear power plant. ANSI N45.2.13 applies to "the work of any individual or organization participating in the procurement of those items and services from which satisfactory performance is required." ANSI N45.2.13 also specifies that personnel performing certain activities be certified/qualified in accordance with ANSI N45.2.6.

Based on the information provided by DLC, therefore, all work methods and processes associated with the receipt inspection function as well as related personnel qualification requirements will continue to satisfy the provisions of ANSI N45.2.13-1976 and ANSI N45.2.6-1978. Accordingly, DLC's proposed approach is consistent with RGs 1.58, 1.123 and NUREG-0800, the "Standard Review Plan" (SRP).

4.0 REFERENCES

1. S. C. Jain, Duquesne Light Company, letter to the Nuclear Regulatory Commission (NRC), "Beaver Valley Power Station, Unit No. 1 and No. 2 - Quality Assurance Organization Change," July 17, 1998
2. D. S. Brinkman, NRC, letter to J. E. Cross, Duquesne Light Company, "Request for Additional Information (RAI) Regarding Review of Beaver Valley Power Station, Unit Nos. 1 and 2, Quality Assurance Organization Change (TAC Nos. MA2360 and MA2362)," August 6, 1998
3. S. C. Jain, Duquesne Light Company, letter to NRC, "Response to NRC Request for Information Dated August 6, 1998," September 21, 1998

3.0 CONCLUSION

The NRC staff concludes that the BVPS-2 UFSAR QA program description incorporating the reductions in commitments described above will continue to satisfy the requirements of Appendix B to 10 CFR Part 50 and is, therefore, acceptable.

Principal Contributor: J. Peralta

Date: October 20, 1998