



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PENNSYLVANIA 19406

SEP 27 1988

Docket Nos. 50-412

Duquesne Light Company  
ATTN: Mr. J. D. Sieber  
Vice President  
Nuclear Group  
Post Office Box 4  
Shippingport, Pennsylvania 15077

Gentlemen:

Subject: Inspection No. 50-412/88-06 O/L

This refers to your letter dated August 18, 1988, in response to our letter dated May 9, 1988.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

**ROBERT M. GALLO**

Robert M. Gallo, Chief  
Operations Branch  
Division of Reactor Safety

cc:

J. J. Carey, Executive Vice President, Operations  
J. D. Crockett, General Manager, Corporate Nuclear Services  
W. S. Lacey, General Manager, Nuclear Operations  
N. R. Tonet, Manager, Nuclear Engineering  
T. P. Noonan, Plant Manager  
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NRC Resident Inspector  
Commonwealth of Pennsylvania

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L. Tripp, DRP

D. Limroth, DRP

P. Tam, LPM, NRR

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9/26/88

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9/28/88

# Duquesne Light Company

Beaver Valley Power Station  
PO Box 4  
Shippingport, PA 15077-0004

62110

JOHN D. SEBER  
Vice President - Nuclear Group

412-643-5255

August 18, 1988

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20535

Reference: Beaver Valley Power Station, Unit No. 2  
Docket No. 50-412, License No. NPF-73  
Response to NRC Concern Contained Within  
Examination Report No. 50-412/88-06 (OL)

Gentlemen:

By letter dated May 9, 1988, the NRC provided Duquesne Light Company (DLC) with Examination Report No. 50-412/88-06 (OL). In the letter the NRC expressed a concern stemming from DLC's comments on the examination questions which relate to the Abnormal Operating Procedures (AOPs). The NRC requested that we review this issue and provide a response regarding our policy and any actions planned to resolve it.

It is stated in the May 9th letter that some AOPs appear to require prompt operator actions and, therefore, should be memorized. It was further noted that our AOPs identify no immediate actions, only "manual" actions. We were requested to review our operational practices and procedures and identify those time-dependent actions needed to mitigate the consequences of the abnormal conditions for inclusion in the AOPs. Through a review of Attachment 3 to the May 9th letter, and the information immediately preceding the above request, we believe that two issues require a response: (1) the identification of immediate manual actions in the AOPs, and (2) our policy as to the operational practice concerning those actions. Based on the above our response follows.

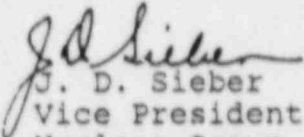
We are currently reviewing the AOPs to determine critical time-dependent actions. The review is being performed for both the Unit-2 and the Unit-1 AOPs. After this review is completed, the changes identified will be reviewed and incorporated into the operating manual. Based on the current status of the above actions, we are scheduling them for completion by December 30, 1988. Immediate manual actions identified and incorporated into the AOPs will be subject to the same operational philosophy as the immediate manual actions in the Emergency Operating Procedures. Consequently, they will require memorization.

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If you have any questions on this response, please contact me or a member of my staff.

Very truly yours,

  
J. D. Sieber  
Vice President  
Nuclear Group

cc: Mr. Robert M. Gallo, Chief Operations Branch, Division of  
Reactor Safety  
Mr. J. Beall, Sr. Resident Inspector  
Mr. W. T. Russell, NRC Region I Administrator  
Mr. P. Tam, Project Manager  
Director, Safety Evaluation & Control (VEPCO)