

Duquesne Light Company

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

JOHN D. SIEBER
Vice President - Nuclear Group

(412) 643-5255

October 7, 1988

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Reference: Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66
Generic Letter 87-02, Unresolved Safety Issue A-46

Gentlemen:

On July 29, 1988, the NRC Staff issued a Safety Evaluation Report (SER) on Revision 0 of the Generic Implementation Procedure (GIP) for Seismic Verification of Nuclear Plant Equipment developed by the Seismic Qualification Utility Group (SQUG). The letter to SQUG, enclosing the SER, requests that SQUG member utilities provide to the NRC, within 60 days, a schedule for implementing the GIP. By letter dated August 19, 1988 to Mr. Shao, SQUG clarified that the sixty days would expire on October 7, 1988. This letter responds to the NRC request for our plant-specific seismic verification plans for Beaver Valley Unit 1, consistent with the requirements of Generic Letter 87-02, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46."

As members of SQUG and the Electric Power Research Institute (EPRI), we have supported the many efforts on which the GIP is based. The SER endorses the methodology and criteria embodied in Revision 0 of the GIP, subject to satisfactory resolution of a number of open issues and NRC comments. Action by SQUG and its contractors is underway to resolve the identified open issues and comments in accordance with the SQUG schedule presented at the August 10-11, 1988 meeting with the NRC staff and included with the SQUG letter to Mr. L. Shao dated August 19, 1988. This schedule projects completion of Revision 2 of the GIP in Spring, 1989, contingent upon SQUG and NRC agreement on the resolution of the various open issues. Revision 2 of the GIP is the version which is scheduled to contain all of the information needed to implement the USI A-46 generic letter at SQUG member plants. The final NRC SER Supplement on Revision 2 of the GIP is anticipated by mid-1989.

Duquesne Light Company's plans for implementation of the GIP at our Beaver Valley Unit 1 plant are necessarily preliminary given the current status of and schedule for completion of Revision 2 of the GIP and NRC's SER Supplement on that revision. However, it is our

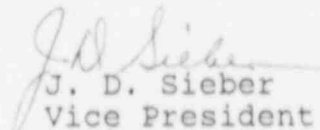
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current plan to resolve USI A-46 for our Beaver Valley Unit 1 plant by implementation of the generic criteria and methodology included in Revision 0 of the GIP, as clarified by the SQUG responses to the NRC SER in SQUG letter to Mr. L. Shao dated September 22, 1988. Assuming no major changes in the workscope currently envisioned, as described in Revision 0 of the GIP including the criteria to be added for cable raceways, tanks, heat exchangers, and relays, we plan to perform the seismic verification plant walkdown required by the GIP by the conclusion of the second refueling outage after receipt of the final SER Supplement and resolution of all open issues. If the final NRC SER Supplement, with no open items, is issued by the second quarter of 1989, then the plant walkdown at Beaver Valley Unit 1 is expected to be completed by the end of our eighth refueling outage currently scheduled for the second quarter of 1991. Identification of safe shutdown equipment, gathering of necessary plant-specific data and training of our walkdown team members will be initiated prior to this outage.

Our current implementation plan and schedule, as described above, are based on the "SQUG Commitments" identified in each section of the GIP. In addition, our implementation and schedule commitment is contingent upon our current understanding of the GIP. If the scope of the final revision of the GIP or the cost and effort required to implement it at our plant(s) change significantly from the current scope and cost estimates, we will have to reevaluate this proposed schedule. Also, in view of the uncertainties in the requirements and schedule for resolution of other related issues (e.g., Eastern Seismicity, Seismic Margins, and Severe Accident Individual Plant External Event Evaluations), the implementation schedule for USI A-46 at Beaver Valley Unit 1 may require future revision to integrate these potential future requirements into a single, cost-effective program. This possibility has been the subject of on-going discussions between SQUG and members of the NRC staff, and further discussions are planned. We will advise you in writing of any changes in our implementation plans and schedules.

Very truly yours,


J. D. Sieber
Vice President
Nuclear Group

cc: Mr. J. Beall, Sr. Resident Inspector
Mr. W. T. Russell, NRC Region I Administrator
Mr. P. Tam, Project Manager