

Duquesne Light Company

411 7th Avenue
P.O. Box 1930
Pittsburgh, PA 15230-1930

JAMES E. CROSS
President
Generation Group

December 24, 1998
L-98-224

(412) 393-6506
Fax (412) 393-6985

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
Quality Assurance Program Description Change

In accordance with 10 CFR 50.54(a)(3), the attached submittal requests NRC approval of existing wording in the Quality Assurance Program description included in the Beaver Valley Power Station Unit No. 2 Updated Final Safety Analysis Report (UFSAR). This wording would allow for review of procurement documents for material and equipment by personnel in the Nuclear Procurement Department. This would limit Quality Services Unit reviews to procurement documents for services only. Currently the Quality Services Unit reviews procurement documents for all safety related purchases.

The proposed review practice has previously been implemented at BVPS, but, as a result of an "extent of condition" review for Notice of Violation 50-334/97-07-02, it was determined that this practice had originated in a manner similar to that which resulted in the violation. Therefore, the practice has been suspended pending NRC approval of this submittal. The UFSAR has not yet been revised to reflect the suspension.

Attachment 1 further describes the proposed change, identifies the reason for the change, and provides the basis for concluding that the revised program incorporating this change continues to satisfy the criteria of 10 CFR 50, Appendix B.

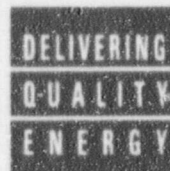
Attachment 2 presents the proposed wording to the Unit 2 UFSAR to reflect this change.

If you have any questions regarding this submittal, please contact Mark S. Ackerman, Manager of Safety and Licensing in the Nuclear Services Group, at (412) 393-5203.

Sincerely,

James E. Cross
James E. Cross

9901060291 981224
PDR ADOCK 05000334
P PDR



Beaver Valley Power Station, Unit No. 1 and No. 2
Quality Assurance Program Description Change
Page 2

c: Mr. D. S. Collins, Project Manager
Mr. D. M. Kern, Sr. Resident Inspector
Mr. H. J. Miller, NRC Region I Administrator

ATTACHMENT 1

CHANGE DESCRIPTION

Currently, Quality Services Unit (QSU) reviews procurement documents for material equipment and services. This change would allow review of procurement documents for material and equipment to be performed by personnel in the Nuclear Procurement Department rather than by QSU staff. As such, QSU would be responsible for reviewing only those purchasing documents related to services.

REASON FOR THE CHANGE

Reviews of procurement documents for materials and equipment by personnel in the Nuclear Procurement Department will permit a reduction in procurement time for parts and materials thereby improving process efficiency while maintaining process quality.

BASIS FOR CONCLUDING THAT THE REVISED PROGRAM INCORPORATING THE CHANGE CONTINUES TO SATISFY THE CRITERIA OF 10 CFR 50, APPENDIX B

The proposed change continues to satisfy the criteria of 10 CFR 50 Appendix B for the following reasons:

- Review independence will be maintained because the individuals in the Nuclear Procurement Department who perform the review of procurement documents for quality requirements and verification of the category designation will be someone other than the person who initiated the procurement document.
- The quality reviews will be performed in accordance with documented procedures.
- Personnel performing reviews of procurement documents for quality requirements shall be provided with training as required to assure that suitable proficiency is achieved and maintained.
- The procurement document reviews will continue to assure that suitable quality requirements are included or referenced in the procurement documents.
- The review process shall continue to assure that conditions adverse to quality identified during the review of procurement documents for quality requirements are promptly identified and corrected.

ATTACHMENT 1 (continued)

- As required, sufficient records shall be maintained to furnish evidence of the procurement document reviews performed.
- Quality Services will provide oversight of the procurement document reviews through periodic audits, surveillances and assessments.
- The proposed review of procurement documents for material and equipment by personnel in the Nuclear Procurement Department is a reduction in commitment to the NRC since procurement is considered to be a line function as opposed to an independent Quality Assurance function. Although this change is a reduction in commitment for the reasons stated, it will not result in a reduction in program effectiveness since BVPS personnel, including the Manager, Nuclear Procurement and his staff have the ability to report any quality issue that they become aware of to the Manager, Quality Services or his staff for investigation and resolution.

ATTACHMENT 2 (continued)

BVPS-2 UFSAR

Rev. TBD

17.2.1.2 Quality Services Unit

Quality Services Inspection & Examination

Quality Services inspection and examination activities are directed by the Director, Quality Services Inspection and Examination under the direction of the Manager, Quality Services Unit. These activities include implementing the quality control inspection program; implementing the non-destructive examination program; providing inspection and examination services; reviewing station work for quality hold points; and identifying and documenting nonconforming conditions.

Quality Data Assessment

Quality data assessment activities are directed by the Supervisor, Quality Data Assessment under the direction of the Manager, Quality Services Unit. These activities include implementing a quality data assessment information service, tracking audit deficiencies, providing trending and performance indicator information (including nonconformance trends), maintaining quality assurance program procedures, and performing quality reviews of site procedures.

Quality Services Audit & Surveillance

Quality Services audit and surveillance (Quality Assurance) activities are directed by the Quality Services Audit and Surveillance supervisors under the direction of the Manager, Quality Services Unit. These activities include implementing the quality assurance audit program, implementing the quality assurance surveillance program, performing source inspections at vendor facilities, evaluating qualified suppliers, reviewing procurement documents for services.

Ombudsman

Under the direction of the Manager, Quality Services Unit, the Ombudsman develops and maintains a Beaver Valley site-wide program to review and attempt to resolve, when appropriate, safety-related concerns and issues identified by Beaver Valley employees, contractors, or consultants who choose to report such concerns in a confidential environment.

17.2.4 Procurement Document Control

The Operations QA Program establishes measures to assure that applicable regulatory requirements, design bases, quality assurance program requirements, and other requirements which are necessary to assure quality are suitably included or referenced in the documents for procurement of material, equipment, and services, whether purchased by DLC or by its contractors or subcontractors.

The procurement documents shall contain provisions which allow access to vendor facilities and records for the purpose of audits and inspections. The procurement document will define, as applicable, the requirements for the retention, control, submittal, and maintenance of records such as drawings, specifications, procedures, qualifications, material, chemical and physical test results.

When applicable, procurement documents shall contain basic technical requirements including component identification, drawings, specifications, codes and industrial standards, including their revision status, tests and inspection requirements, and special process instructions for activities such as fabrication, cleaning, erecting, packaging, handling, shipping, storing, and inspecting.

Procurement documents are required to specify appropriate reporting and dispositioning requirements for vendor identified nonconformances.

The Operations QA Program requires that procedures be established which describe the sequence of preparation, review, approval, and control of procurement documents, and will identify the responsibilities of the individuals and organizations which are associated with those activities.

The procurement documents will be reviewed to determine that all quality requirements are correctly stated, and to assure that the procurement document has been prepared in accordance with the requirements of the Operations QA Program. The review of procurement documents will be performed by an individual or organization other than the person responsible for preparing the procurement documents, in accordance with the provisions of the Operations QA Program. Nuclear Procurement Department personnel will perform this independent review for parts and materials.

Revisions or changes to quality or technical requirements in procurement documents will be subjected to the same review requirements as the original document. The review and approval of procurement documents, including any revisions or changes thereto, will be documented, and such evidence will be maintained available for verification.