

# Duquesne Light Company

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

SUSHIL C. JAIN  
Division Vice President  
Nuclear Services  
Nuclear Power Division

December 8, 1997  
L-97-070

(412) 393-5512  
Fax (412) 643-8069

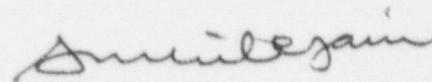
U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555-0001

**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**  
**Integrated Inspection Report 50-334/97-07 and 50-412/97-07**  
**Reply to Notice of Violation**

In response to NRC correspondence dated November 7, 1997, and in accordance with 10 CFR 2.201, the attached reply addresses the Notice of Violation transmitted with the subject inspection report.

If there are any questions concerning this response, please contact Mr. J. Arias at (412) 393-5203.

Sincerely,

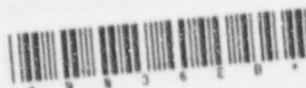


Sushil C. Jain

## Attachment

- c: Mr. D. S. Brinkman, Sr. Project Manager  
Mr. P. W. Eselgroth, Chief, Reactor Projects Branch No. 7, Region I  
Mr. C. W. Hehl, Director, Division of Reactor Projects  
Mr. D. M. Kern, Sr. Resident Inspector  
Mr. H. J. Miller, NRC Region I Administrator

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Q PDR



DUQUESNE LIGHT COMPANY  
Nuclear Power Division  
Beaver Valley Power Station, Unit Nos. 1 and 2

**Reply to Notice of Violation**

Integrated Inspection Report 50-334/97-07 and 50-412/97-07  
Letter Dated November 7, 1997

**VIOLATION (Severity Level IV, Supplement I)**

**Description of Violation (50-334(412)/97-07-02)**

10 CFR 50.54(a)(3) requires, in part, that changes to the quality assurance program description that reduce the commitments (in the program description previously accepted by the NRC) be submitted to the NRC and receive NRC approval prior to implementation.

Contrary to the above, in April 1994 the licensee changed the quality assurance program, resulting in a reduction in commitments in the quality assurance program description previously accepted by the NRC without prior NRC approval. Specifically, the licensee realigned the Quality Control receipt inspectors from the Quality Services Unit to the procurement department. This organizational change reduced the authority and organizational freedom of the quality control organization performing procurement receipt inspections.

**Reason for the Violation**

In January 1994, prior to the Quality Control personnel who were performing receiving inspections being reassigned to Nuclear Procurement, the Quality Services Unit (QSU) performed a review of the QA Program description contained in Unit 2 UFSAR, Section 17.2 and determined that a 10 CFR 50.54(a)(3) evaluation was not required. This was based on the Unit 2 UFSAR Section 17.2 not containing any details identifying to whom the inspectors performing receiving inspections reported and the proposed change not requiring any rewording of that section.

This Unit 2 UFSAR section contained the QA Program description applicable for both Units 1 and 2, which was submitted to the NRC in 1988 for approval. The proposed change did not require any rewording of this QA Program description for the Beaver Valley Power Station contained in the Unit 2 UFSAR Section 17.2. It was QSU's understanding that only actual wording changes to this Unit 2 UFSAR section or to the UFSAR positions on QA related Regulatory Guides needed to be reviewed for potential reductions to the QA Program description commitments under 10 CFR 50.54(a)(3). It



was not believed that a change to the Unit 2 UFSAR Chapter 13 could reduce the QA Program description commitments.

#### Corrective Actions Taken and the Results Achieved

The QSU performed a 10 CFR 50.54(a)(3) evaluation regarding the reassignment of the Quality Control receiving inspection function from QSU to the Nuclear Procurement Department, which occurred in April 1994. This evaluation was completed on October 10, 1997, and concluded that this reassignment of personnel was a reduction in commitments to the NRC. Following this determination, and also on October 10, 1997, the Vice President, Nuclear Services issued a letter (NPDSVP:7934) which effective immediately and until further notice, functionally reassigned the Quality Control receiving inspection function to the Manager, QSU.

#### Corrective Actions to Prevent Further Violations

The following additional corrective actions will be implemented:

- The root cause evaluation for this event will be reviewed with the Quality Services Unit personnel responsible for performing 10 CFR 50.54(a)(3) evaluations. This will be completed by December 22, 1997.
- A review of organizational changes related to the Quality Assurance Program, including transfer of personnel or responsibilities from QSU to other organizations, which occurred after January 1994 will be performed. This is the period when certain changes to QA processes were implemented to more effectively utilize resources. This review will identify if any additional 10 CFR 50.54(a)(3) evaluations are required and will be completed by February 28, 1998.
- Additional reviews of UFSAR sections (other than the Unit 2 UFSAR, Section 17.2) will be performed to determine if there are other instances where changes to those sections could potentially result in a reduction in commitments in the Quality Assurance Program description. These reviews will be completed by March 31, 1998. Should any additional instances be identified Condition Reports will be written.
- Revise procedure NPDAP 7.3, "Annual Final Safety Analysis Report Update" to ensure the question of whether a proposed change to the UFSAR can result in a reduction in commitments in the Quality Assurance Program description is addressed. This revision will be completed by May 29, 1998.

- Develop and implement a process to review organizational changes prior to implementation to ensure licensing documents and commitments are not affected. This will be completed by June 30, 1998.

Date When Full Compliance Will Be Achieved

With the reassignment of the Quality Control receiving inspection function to the Manager, QSU on October 10, 1997, the issue of the requirement to submit a 10 CFR 50.54(a)(3) evaluation to the NRC was resolved and full compliance was achieved.

No other issues of non-compliance have been identified. If the additional corrective actions identify any new issues of potential non-compliance, appropriate corrective actions will be implemented.