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March 16, 1999

L-99-015

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

**Subject: Beaver Valley Power Station, Units No. 1 and No. 2
BV-1 Docket No. 50-334, License No. DPR-66
BV-2 Docket No. 50-412, License No. DPR-73
Quality Assurance Program Description Change**

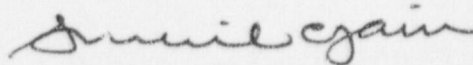
In accordance with 10 CFR 50.54(a)(3)(ii), this letter forwards for NRC approval, a proposed change to the Beaver Valley Power Station (BVPS) Units 1 and 2 Operations Quality Assurance (QA) Program Description.¹ This change would reduce the QA Program Description commitments for both Units by limiting required Onsite Safety Committee (OSC) reviews of procedures to those requiring a 10 CFR 50.59 safety evaluation. Similar procedure review programs have received NRC approval for other nuclear facilities, including Limerick Generating Station, Peach Bottom Generating Station, and Wolf Creek Generating Station.

Attachment 1 further describes the proposed change, 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 changes to the Unit No. 2 UFSAR to reflect this change.

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

Sincerely,



Sushil C. Jain

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¹ The Operations QA Program description for BVPS Unit 1 was deleted from the Unit 1 Updated Final Safety Analysis Report (UFSAR) in January 1988 and the program description for BVPS Units 1 and 2 is provided in Section 17.2 of the Unit 2 UFSAR.



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

ATTACHMENT 1

PROPOSED CHANGE DESCRIPTION

Currently, with respect to permanent procedure changes, the Onsite Safety Committee (OSC) reviews all procedures required by Technical Specifications 6.8 and intent changes thereto, as part of its responsibilities. These are subsequently approved by the General Manager of Nuclear Operations (GMNO). The proposed change would allow substitution of a review by an independent qualified reviewer (IQR) and approval by the responsible discipline Manager or his designee when a 10 CFR 50.59 safety evaluation is not required. The OSC would review all new procedures requiring safety evaluations, and procedure revisions which require safety evaluations as defined by 10 CFR 50.59.

At present, temporary changes to procedures are reviewed similar to permanent changes when a change of intent is involved. If intent is not being changed, approval by two members of plant management (one holding an SRO license) is required prior to implementation. OSC review and GMNO approval may then be obtained up to 14 days following implementation. With the proposed change, when no safety evaluation is required, temporary changes to procedures would be approved by two knowledgeable members of the plant staff, with at least one of these individuals a member of plant supervision. One of these individuals must hold an SRO license if plant operations procedures are affected. These changes would be reviewed by an IQR and approved by the responsible manager or his designee within 14 days of implementation.

IQRs would be qualified to perform 10 CFR 50.59 applicability determinations. IQRs would meet or exceed the qualified levels of a staff specialist, as described in ANSI N18.1-1971 and would be certified by the OSC and approved by the Plant Manager. These reviewers could be from the same organization; however, they would not be the preparer of the proposed procedure or procedure change. In addition, these reviewers would determine the necessity for and ensure a cross-disciplinary review, if necessary, prior to procedure approval. The qualifications of the IQRs and the review process employed would provide a level of expertise similar to that provided by the OSC. Similar procedure review programs, employing certified independent qualified reviewers, have received NRC approval for other nuclear facilities, including Limerick Generating Station, Peach Bottom Generating Station, and Wolf Creek Generating Station. Pending NRC approval of the IQR process, BVPS intends to commence implementation of this process on June 30, 1999.

The proposed change would eliminate OSC reviews of the security plan, emergency plan, and associated implementing procedures except as specified in the plans.

ATTACHMENT 1 (continued)

REASON FOR THE PROPOSED CHANGE

This proposed change would improve OSC effectiveness by better concentrating the OSC focus on issues important to safety. This would improve utilization of management personnel serving on the OSC and other members of the plant staff. In addition, this would maintain the quality and efficiency of the procedure review process and thorough reviews of issues with potential for affecting nuclear safety.

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

With incorporation of this proposed change to the procedure review process, the revised QA Program would continue to satisfy the criteria of 10 CFR 50, Appendix B. Section VI, "DOCUMENT CONTROL" of the Appendix allows the licensee to designate a responsible organization, other than the organization that performed the original review and approval, to review and approve proposed procedures and procedure changes. With this proposed change, adequate controls will remain which ensure the OSC will continue to review proposed procedures or proposed changes in procedures which require safety evaluations. The proposed change is consistent with ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants,"/ANS 5.2.15, "Review, Approval and Control of Procedures," and NRC Generic Letter 93-07, "Modification of Technical Specification Administrative Control Requirements for Emergency and Security Plans."

ATTACHMENT 2

BVPS-2 UFSAR

Revision (TBD)

17.2.1.3 Onsite Safety Committee (OSC)

The OSC shall function to advise the General Manager, Nuclear Operations on all matters related to nuclear safety and shall provide review capability in the areas of:

1. Nuclear power plant operations.
2. Radiological safety.
3. Maintenance.
4. Nuclear engineering.
5. Nuclear power plant testing.
6. Technical advisory engineering.
7. Chemistry.
8. Quality control.
9. Instrumentation and control.

The Onsite Safety Committee Coordinator is the OSC Chairman and shall appoint all members of the OSC. The membership shall consist of a minimum of one individual from each of the areas designated above.

OSC members and alternates shall meet or exceed the minimum qualifications of ANSI N18.1-1971 Section 4.4 for comparable positions. The nuclear power plant operations individual shall meet the qualifications of Section 4.2.2 and the maintenance individual shall meet the qualifications of Section 4.2.3.

All alternate members shall be appointed in writing by the OSC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in OSC activities at any one time.

The OSC shall meet at least once per calendar month and as convened by the OSC Chairman or his designated alternate. A quorum of the OSC shall consist of the Chairman or his designated alternate and at least one half of the members including alternates.

The OSC shall be responsible for:

1. Review of new ~~a) all procedures required by Technical Specification 6.8 and changes of intent thereto, b) any other proposed procedures requiring 10 CFR 50.59 safety evaluations and~~ changes to existing procedures thereto which

ATTACHMENT 2 (continued)

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~~require 10 CFR 50.59 safety evaluations as determined by the General Manager, Nuclear Operations to affect nuclear safety.~~

2. Review of all proposed tests and experiments that affect nuclear safety.
3. Review of all proposed changes to the Technical Specifications.
4. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
5. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the General Manager, Nuclear Operations and to the Chairman of the Offsite Review Committee.
6. Review of all reportable events of the type described in 10 CFR 50.73.
7. Review of facility operations to detect potential safety hazards.
8. Performance of special reviews, investigations or analyses and reports thereon as requested by the Chairman of the Offsite Review Committee.
- ~~9. Review of the Security Plan and implementing procedures.~~
- ~~10. Review of the Emergency Plan and implementing procedures.~~

The OSC shall:

1. Recommend to the General Manager, Nuclear Operations written approval or disapproval of items considered under OSC responsibility 1 through 4 above.
2. Render determinations in writing with regard to whether or not each item considered under OSC responsibility 1 through 5 above constitutes an unreviewed safety question.
3. Provide written notification within 24 hours to the President, Generation Group and Chief Nuclear Officer and the Offsite Review Committee of disagreement between the OSC and the General Manager, Nuclear Operations; however, the General Manager, Nuclear Operations shall have responsibility for resolution of such disagreements pursuant to Technical Specification 6.1.1.

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The OSC shall maintain written minutes of each meeting and copies shall be provided to the General Manager, Nuclear Operations and Chairman of the Offsite Review Committee.

17.2.5 Instructions, Procedures, and Drawings

The Operations QA Program requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and will be accomplished in accordance with these instructions, procedures, or drawings.

These instructions, procedures, or drawings include, as appropriate, the requirements for special tools, test equipment, processes, controls, or skills, in order to attain the required level of quality. The instructions, procedures, or drawings will include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

The Beaver Valley Power Station Operating Manual includes instructions and procedures covering the requirements of NRC Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operations)", Appendix A, as they apply to Pressurized Water Reactors. The Operating Manual is implemented, enforced, and maintained by the General Manager, Nuclear Operations Unit, and staff. These procedures and/or instructions include step-by-step procedures for operating and securing the various systems, actions to be taken in the event of abnormal or emergency conditions and precautions to preclude exceeding system or equipment design. The applicable requirements of NRC Regulatory Guide 1.33 were used as guidance in the development of startup, operating, emergency, maintenance, and testing procedures. Maintenance, repair, modifications, testing, and refueling activities which affect the quality or safety of Category I items are prescribed by documented instructions, procedures, or drawings. These instructions, procedures, or drawings include, as appropriate, the requirements for special tools, test equipment, processes, controls, or skills, in order to attain the required level of quality.

Each procedure of Technical Specification 6.8 and changes thereto shall be reviewed by an independent qualified reviewer and approved by the responsible manager or designee. The independent reviewer shall also coordinate cross-disciplinary reviews, if necessary. Independent qualified reviewers shall be selected based on knowledge of the pertinent functional area and qualification is subject to OSC review and plant manager approval. Refer to Section 17.2.1.3 for a description of OSC review responsibilities related to procedure revisions. ~~Each procedure and administrative policy of Technical Specification 6.8.1 and changes of intent thereto, shall be reviewed by the OSC and approved by the General Manager, Nuclear Operations, predesignated alternate or a predesignated~~

ATTACHMENT 2 (continued)

BVPS-2 UFSAR

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~~Manager to whom the General Manager, Nuclear Operations has assigned in writing the responsibility for review and approval of specific subjects considered by the committee, as applicable. Changes to procedures and administrative policies of Technical Specification 6.8.1 that do not receive OSC review, such as correcting typographical errors, reformatting procedures and other changes not affecting the purpose for which the procedure is performed shall receive an independent review by a qualified individual and approved by a designated manager or director.~~

Temporary changes to procedures will be approved by two knowledgeable members of the Beaver Valley staff prior to implementation. At least one of these will be a member of supervision. If the change affects operations procedures, at least one will be a person holding a senior reactor operator license for the unit affected. Prior to implementation, the OSC shall review and recommend approval of temporary changes to procedures which require a 10 CFR 50.59 safety evaluation. Within 14 days of implementation, temporary changes will be reviewed by an independent qualified reviewer and approved by the responsible manager or his designee. Temporary changes to procedures of Technical Specification 6.8.1 may be made provided:

- ~~1. The intent of the original procedure is not altered.~~
- ~~2. The change is approved by two (2) members of the plant management staff, at least one (1) of whom holds a Senior Reactor Operator's License on the unit affected.~~
- ~~3. The change is documented, reviewed by the OSC and approved by the General Manager, Nuclear Operations, predesignated alternate or a predesignated Manager to whom the General Manager, Nuclear Operations has assigned in writing the responsibility for review and approval of specific subjects, within 14 days of implementation.~~