

Mr. J. E. Cross  
President-Generation Group  
Duquesne Light Company  
Post Office Box 4  
Shippingport, PA 15077

October 28, 1999

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) REGARDING REVIEW OF  
BEAVER VALLEY POWER STATION, UNIT NOS. 1 AND 2, QUALITY  
ASSURANCE PROGRAM CHANGE (TAC NOS. MA6415 AND MA6416)

Dear Mr. Cross:

By letter dated August 30, 1999 (L-99-012), Duquesne Light Company (DLC) submitted proposed changes to the Beaver Valley Power Station, Unit Nos. 1 and 2 (BVPS-1 and BVPS-2), Quality Assurance (QA) Program described in the BVPS-2 Updated Final Safety Analysis Report (UFSAR), Chapter 17.2, which is applicable to both BVPS-1 and BVPS-2. The proposed changes would reduce commitments in the BVPS-1 and BVPS-2 QA Program description previously approved by the Nuclear Regulatory Commission (NRC).

The NRC staff has been reviewing your submittal; however, we have determined that additional information is required from DLC in order to complete our review. Areas of concern resulting from our review have been discussed with the your staff in a telephone conference on October 21, 1999. Based on our need for additional information, we do not regard the proposed changes in Section 17.2 of the BVPS-2 UFSAR to be acceptable pursuant to 10 CFR 50.54(a). Therefore, you should refrain from implementing these changes until you have been formally notified otherwise.

The NRC requests that you provide your response to the enclosed RAI within 90 days of receipt of this letter. This was discussed with Mr. R. Hart of your staff, and was established as a mutually agreeable timetable for your response. If circumstances result in the need to revise the target date, please call me at the earliest opportunity.

Should you have any questions regarding this request, please contact me at (301) 415-1427.

Sincerely,

ORIGINAL SIGNED BY:

Daniel S. Collins, Project Manager, Section 1  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-334 and 50-412

Enclosure: Request for Additional Information

cc w/encls: See next page

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

October 28, 1999

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Should you have any questions regarding this request, please contact me at (301) 415-1427.

Sincerely,

A handwritten signature in cursive script that reads "Daniel S. Collins".

Daniel S. Collins, Project Manager, Section 1  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-334 and 50-412

Enclosure: Request for Additional Information

cc w/encl: See next page

Beaver Valley Power Station, Units 1 and 2

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REQUEST FOR ADDITIONAL INFORMATION

PROPOSED QUALITY ASSURANCE PROGRAM CHANGES

BEAVER VALLEY POWER STATION, UNIT NOS. 1 AND 2

DOCKET NOS. 50-334 AND 50-412

By letter dated August 30, 1999, the Duquesne Light Company (DLC) submitted a request for approval of changes in the Quality Assurance (QA) Program described in the Beaver Valley Power Station, Unit 2, (BVPS-2) Updated Final Safety Analysis Report (UFSAR), Chapter 17.2 (applicable to both Beaver Valley Units 1 and 2). Specifically, the change would reduce the Operations QA Program description commitments by no longer requiring personnel in select job positions to qualify to the requirements of Regulatory Guide (RG) 1.58, Revision 1, that endorses ANSI N45.2.6 - 1978.

Currently, Beaver Valley personnel in job positions described within 10 CFR 50.120 and 10 CFR Part 55 are qualified to the requirements of ANSI N45.2.6 - 1978 which is conditionally endorsed by RG 1.58, Revision 1. These personnel may perform inspections, examination, or testing as part of their job responsibilities. Through this proposed change, the training requirements of ANSI N45.2.6 and RG 1.58 would no longer apply. For these personnel, the basis for training and qualification of personnel in these job classifications would be the satisfactory completion of the training programs required by 10 CFR 50.120 and 10 CFR Part 55.

Pursuant to 10 CFR Part 50, Appendix B, Criteria II, it is required that the QA Program provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained. Also, 10 CFR 50.34(b)(6)(ii) requires a discussion of how the applicable requirements of Appendix B will be satisfied. RG 1.58, which endorses ANSI N45.2.6, describes how the training requirements are satisfied. However, 10 CFR 50.120 and 10 CFR Part 55 do not describe in sufficient detail how the training requirements are satisfied.

DLC must describe how the training requirements of 10 CFR Part 50, Appendix B, Criterion II, are achieved pursuant to 10 CFR 50.34(b)(6)(ii). Merely stating a reference to 10 CFR 50.120 or 10 CFR Part 55 is not sufficient enough to describe training requirements. The description must be part of the QA Program description that requires changes to be controlled by 10 CFR 50.54(a) and not just part of the UFSAR. Please provide appropriate revisions of the QA Program which incorporate this information and support the QA Program change requested in your August 30, 1999, submittal.