



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
REGARDING PROPOSED REVISIONS TO THE
QUALITY ASSURANCE PROGRAM DESCRIPTION
DUQUESNE LIGHT COMPANY
OHIO EDISON COMPANY
PENNSYLVANIA POWER COMPANY
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY
THE TOLEDO EDISON COMPANY
BEAVER VALLEY POWER STATION, UNIT NOS. 1 AND 2
DOCKET NOS. 50-334 AND 50-412

1.0 INTRODUCTION

By letter dated August 30, 1999, the Duquesne Light Company (DLC) submitted a request for approval of a proposed change in the Beaver Valley Power Station, Unit Nos. 1 and 2 (BVPS-1 and BVPS-2), Quality Assurance (QA) Program described in Chapter 17.2 of the BVPS-2 Updated Final Safety Analysis Report (UFSAR). The BVPS-1 and BVPS-2 QA Program description is applicable to both units and is contained in the BVPS-2 UFSAR. Specifically, DLC proposed permitting Quality Services Unit staff members to perform random reviews of lower tier administrative procedures for compliance after the procedures are accomplished. All other required technical, functional, or administrative reviews would still be accomplished prior to implementation. This change was submitted pursuant to 10 CFR 50.54(a)(3) as a change that reduces commitments in the BVPS-1 and BVPS-2 QA Program description previously approved by the Nuclear Regulatory Commission (NRC).

2.0 EVALUATION

2.1 Current Commitment:

The BVPS-2 UFSAR, Section 17.2.5, states, "Each procedure and administrative policy of Technical Specification 6.8.1 and changes of intent thereto, shall be reviewed by the OSC [Onsite Safety Committee] and approved by the General Manager, Nuclear Operations, ..." Also, BVPS-2 UFSAR, Section 17.2.6, states, "Changes to approved and released documents will be reviewed and approved by the same individuals or organizations which performed the original review and approval, whenever practical."

The Operations Quality Assurance Program Description presented in the BVPS-2, UFSAR includes the following commitment:

"Duquesne Light Company personnel supporting the QA effort include the Nuclear Power Division, and Customer Operations. Personnel in the Nuclear Power Division, and others in Customer Operations who participate in the program, perform their duties in accordance with administrative procedures previously reviewed by the Quality Services Unit ..."

The Quality Services Unit currently reviews Nuclear Power Division Administrative Procedures (NPDAPs), lower tier administrative procedures identified in Attachment 1 of NPDAP 2.3, "Procedure Review and Approval," and other select quality assurance related administrative procedures. These procedures are referred to as "site procedures" in the current Section 17.2.1.2 of the BVPS-2 UFSAR. These reviews are performed prior to implementation of these procedures or revisions to these procedures.

2.2 Proposed Change:

The proposed change would permit a random review of lower tier administrative procedures by the Quality Services Unit staff after the implementation of the procedures in lieu of a review of lower tier administrative procedures by the Quality Services Unit before implementation. However, the primary review performed by the OSC will still take place as described in UFSAR Section 17.2.5 and 17.2.6.

3.0 CONCLUSION

Beaver Valley's Operations Quality Assurance Program Description commits to Regulatory Guide 1.33, Revision 2, that conditionally endorses ANSI N18.7-1976/ANS-3.2. Section 17.2.5 and 17.2.6 of the BVPS-2 UFSAR implements NRC Regulatory Guide 1.33 that requires each procedure and administrative policy, and changes of intent thereto, to be reviewed by the OSC prior to implementation. ANSI N18.7, Section 5.2.15, also states, "Each procedure shall be reviewed and approved prior to initial use."

The Quality Service Unit staff review of lower tier administrative procedures is an additional commitment to the Quality Assurance Program Description specific to Beaver Valley Power Station. The Quality Service Unit staff must perform audits of the lower tier administrative procedures. As an input to the assessments and audits, the Quality Service Unit staff reviewed lower tier administrative procedures prior to implementation. The change to allow the Quality Service Unit staff to randomly review lower tier administrative procedures after implementation is an accepted method to carry out their assessment and audit duties. Also, the Quality Service Unit staff will randomly review lower tier administrative procedure through a biennial audit, surveillances, or assessments and will continue to review higher tier administrative procedures. This change is an acceptable method of implementing 10 CFR Part 50, Appendix B, Criteria II and XVIII.

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