



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

October 28, 1999

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) REGARDING REVIEW OF  
BEAVER VALLEY POWER STATION, UNIT NOS. 1 AND 2, QUALITY  
ASSURANCE PROGRAM CHANGE (TAC NOS. MA6419 AND MA6420)

Dear Mr. Cross:

By letter dated September 2, 1999 (L-99-098), 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 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.

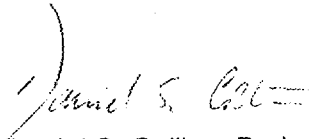
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The NRC staff notes that the issues raised in the enclosed RAI are similar to those raised in a previous RAI for your March 16, 1999, submittal (L-99-015) which requested NRC approval for use of independent qualified reviewers for procedural changes. Because of the similar nature of these requests, the remainder of the NRC staff's review of these requests may be combined.

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

Sincerely,



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 September 2, 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. The BVPS-1 and BVPS-2 QA Program description is applicable to both units and is contained in the BVPS-2 UFSAR.

Beaver Valley, Unit 2, UFSAR, Section 17.2.3, regarding design control, currently specifies, in part, that the Operations QA Program requires that all design changes of safety-related items shall be reviewed by the Onsite Safety Committee (OSC) and the Offsite Review Committee (ORC) in accordance with the QA Program description and the requirements of the Operations QA Program. As part of its responsibilities, the OSC now reviews all modifications and changes to the facility involving safety-related items (i.e. those items that require a 10 CFR 50.59 evaluation). The proposed change to Section 17.2.3 would allow the OSC to limit reviews of modifications and changes of safety-related and nonsafety-related items to those requiring a completed 10 CFR 50.59 evaluation. Also proposed, is a change to Section 17.2.1.3 which requires the OSC to review those proposed tests, experiments, modifications, and changes which require a completed 10 CFR 50.59 evaluation.

The review of design changes of all safety-related items is an appropriate process requiring focus by the OSC. The level of review can vary depending on the nuclear safety significance of the change. One indicator of the nuclear safety significance is the determination to perform a complete 10 CFR 50.59 safety evaluation. However, the OSC, or its designee, must review their plant staff's determination to not perform a complete 10 CFR 50.59 safety evaluation. The OSC is the only group required to review this determination which has nuclear safety significance before the changes are implemented.

The reviews described in the Operations QA Program derived from one version of Beaver Valley's TSs. The TS was allowed to be relocated into the Operations QA Program description with subsequent changes controlled in accordance with 10 CFR 50.54(a). The intent of the TS required a review of all proposed tests, experiments, changes or modifications to plant systems or equipment that affect nuclear safety. This proposed change would compromise the intent.

The existing QA Program for BVPS-1 and BVPS-2 does not explicitly define, in UFSAR Chapter 17.2 of BVPS-2, the requisite qualifications and review responsibilities for personnel who will be performing 50.59 screenings or reviews. Beaver Valley Power Station must describe in their QA Program who performs the 10 CFR 50.59 screening reviews that might result in not completing a full 10 CFR 50.59 review. Also, the qualifications of the 10 CFR 50.59 screening reviewer must be provided. Please provide appropriate revisions of the QA Program which incorporate this information and support the QA Program change requested in your September 2, 1999, submittal.

October 28, 1999

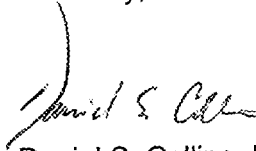
J. Cross

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Daniel S. Collins, Project Manager, Section 1  
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