

November 12, 1999

MEMORANDUM TO: File

Original signed by:

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

SUBJECT: BEAVER VALLEY POWER STATION, UNITS 1 AND 2, DRAFT
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION,
REGARDING QUALITY ASSURANCE PROGRAM CHANGES [TAC
NOS. MA6419 AND MA6420]

The attached draft response to a request for additional information (RAI) was received via facsimile on November 10, 1999, from Mike Pastva of Duquesne Light Company (DLC; the licensee) in preparation for a conference call between the Nuclear Regulatory Commission (NRC) staff and the licensee. The licensee requested the call, and provided the draft response, so that DLC can ensure that their response adequately and completely answers the staff's questions and avoid further RAIs. This memorandum and the attachment do not convey a formal response to the RAI by the licensee or represent an NRC staff position.

Docket Nos. 50-334 and 50-412

Attachment: As stated

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**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

WASHINGTON, D.C. 20555-0001

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Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

A handwritten signature in black ink that reads "Daniel S. Collins" with a horizontal line at the end.

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ATTACHMENT 1

DRAFT

PROPOSED CHANGE DESCRIPTION

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 OSC and ORC (Offsite Review Committee) in accordance with the quality assurance 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 applicability determination or involve 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 non safety related items to those requiring a completed 10 CFR 50.59 evaluation. The 10 CFR 50.59 applicability determination and any associated 10 CFR 50.59 safety evaluation will be performed by personnel qualified under a training program, which meets the requirements of ANSI/ANS 18.1-1971, Section 5.3, as outlined in plant administrative procedures. 10 CFR 50.59 safety evaluation applicability determinations that might result in not completing a full 10 CFR 50.59 safety evaluation will be performed by those personnel, who meet the applicable qualifications of ANSI/ANS 18.1-1971, Section 4.6.2 for a Staff Specialist.

A change will also be made to Section 17.2.1.3 which will limit OSC reviews those proposed tests and experiments and modifications and changes which require a completed 10 CFR 50.59 evaluation. In addition, the ORC would continue to meet the requirement in Section 17.2.1.4, to review proposed and completed changes to equipment or systems, regarding a potential or actual unreviewed safety question, as defined in 10 CFR 50.59.

REASON FOR THE PROPOSED CHANGE

OSC reviews now include modifications and changes that do not require a completed 10 CFR 50.59 safety evaluation and are, therefore, outside the realm of what could constitute an unreviewed safety question. Limiting these reviews would improve the OSC focus and effectiveness by better concentrating resources on issues considered to be important to nuclear safety. Additional benefits would include improved utilization of management personnel and other members of the plant staff serving on the OSC.

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

The proposed change is a reduction in commitment to the NRC, as it would no longer require the OSC to review all proposed changes or modifications to the plant systems or equipment. However, this change will not compromise the intent of the Operations QA Program based on the following:

DRAFT

ATTACHMENT 1 (continued)

- 10 CFR 50.59 safety evaluation applicability determinations will continue to be performed by personnel having qualifications equivalent to the OSC to perform 10 CFR 50.59 safety evaluation applicability determinations.
- Proposed changes, which require a completed 10 CFR 50.59 safety evaluation, will continue to be reviewed by the OSC.
- Limiting OSC reviews to those proposed changes which require completed 10 CFR 50.59 safety evaluations will result in improved OSC focus and effectiveness by better concentration of OSC resources on issues important to nuclear safety.

In addition, with this change the Operations QA Program will continue to satisfy 10 CFR 50, Appendix B since no changes were made to the Program description that affect our commitments to 10 CFR 50, Appendix B.

ATTACHMENT 2

DRAFT

BVPS-2 UFSAR

Revision (TBD)

DRAFT as of 11/1 * (NO additional changes proposed in this particular section since L-99-098)

The Operations QA Program provides measures to assure that changes or deviations from specified design requirements or quality standards are identified, documented, and controlled.

Design changes at BVPS after release and acceptance of design documents are subject to design control measures commensurate with those originally applied to the design. The Operations QA Program requires that, whenever practical, changes should be reviewed and approved by organizations that originally performed the review and approval of the design. In the event that it is not practical for the original organizations to perform the required review and approval, other responsible organizations will be designated. The designated organization shall have access to pertinent background information, have competence in the specific design area of interest, and have adequate understanding of the requirements and intent of the original design.

Design documentation, including design review reports, specifications, drawings, and revisions thereto shall be collected, filed, stored, and maintained in a systematic manner.

~~The Operations QA Program requires that a~~ All design changes of safety-related and non-safety-related items that require a completed 10 CFR 50.59 safety evaluation shall be reviewed by the OSC and the ORC in accordance with this quality assurance program description and the requirements of the Operations QA Program. Safety evaluations are conducted, as required by 10 CFR 50.59. OSC and ORC review of design changes is discussed in Sections 17.2.1.3 and 17.2.1.4 of the Operations Quality Assurance Program description.

17.2.4 Procurement Document Control

ATTACHMENT 2 (Continued)

BVPS-2 UFSAR

ATTACHMENT 2 (continued)

10 CFR 50.59 applicability determination and any associated 10 CFR 50.59 safety evaluation will be performed by personnel qualified under a training program, which meets the requirements of ANSI/ANS 18.1-1971, Section 5.3, as outlined in plant administrative procedures. These personnel shall meet the applicable qualifications of ANSI/ANS 18.1-1971, Section 4.6.2 for a Staff Specialist.

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~~ require a completed 10 CFR 50.59 safety evaluation. The 10 CFR 50.59 applicability determination and any associated 10 CFR 50.59 safety evaluation will be performed by personnel qualified under a training program, which meets the requirements of ANSI/ANS 18.1-1971, Section 5.3, as outlined in plant administrative procedures. These personnel shall meet the applicable qualifications of ANSI/ANS 18.1-1971, Section 4.6.2 for a Staff Specialist.
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.

ATTACHMENT 2 (Continued)

BVPS-2 UFSAR

17.2.1.3 Onsite Safety Committee (OSC) DRAFT as of 11/8 (see changes)

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 a) all procedures required by Technical Specification 6.8 and changes of intent thereto, b) any other proposed procedures or changes thereto as determined by the General Manager, Nuclear Operations to affect nuclear safety.
2. Review of all proposed tests and experiments that ~~affect nuclear safety~~ require a completed 10 CFR 50.59 safety evaluation. The