



Duquesne Light Company

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L-99-174

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

**Subject: Beaver Valley Power Station, Unit No. 1 and No. 2
BV-1 Docket No. 50-334, License No. DPR-66
BV-2 Docket No. 50-412, License No. NPF-73
Additional Requested Information on Proposed Change
to the Operations Quality Assurance Program Description**

By letter dated March 16, 1999, Duquesne Light Company (DLC) submitted for NRC approval, in accordance with 10 CFR 50.54(a)(3)(ii), a proposed change to the Beaver Valley Power Station (BVPS) Units 1 and 2 Operations Quality Assurance (QA) Program Description¹. This change would reduce the Program Description commitments for both Units by permitting the Onsite Safety Committee (OSC) to review only those procedures requiring a completed 10 CFR 50.59 safety evaluation. Essential to this change would be the substitution of procedure reviews by an Independent Qualified Reviewer (IQR) and approval by the responsible discipline Manager or his designee, in place of OSC review when a completed 10 CFR 50.59 safety evaluation is not required. By letter dated May 14, 1999, the NRC provided to DLC a request for additional information (RAI) to define the requisite qualifications, authority, and review responsibility of an IQR. DLC provided a response to the RAI, by letter dated June 25, 1999. Per subsequent telephone conversations between the NRC and DLC on October 4, 1999, and November 10, 1999, the NRC has requested additional clarification be provided regarding the qualification and training requirements for IQRs. This additional information is provided in Attachment 1.

Attachment 2 provides a revised markup for the proposed changes to UFSAR Section 17.2.5, which supersede those changes previously proposed for this section in DLC's submittal of June 25, 1999. Attachment 2 includes a markup of previously proposed changes to UFSAR Section 17.2.1.3, which remain unchanged by this submittal, and a markup of recently incorporated changes to UFSAR Sections 17.2.1.3 and 17.2.5, from

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an approved Technical Specification amendment that included changing the position description of General Manager, Nuclear Operations, to Division Vice President, Nuclear Operations Group and Plant Manager.

Following NRC approval of the proposed change, the transition from our current procedure review and approval process to the IQR process will be conducted in a deliberate and controlled manner. The final step in this transition will be implementation of the proposed UFSAR changes, as outlined in this submittal.

If there are any questions concerning this matter, please contact Mr. Mark S. Ackerman, Manager, Safety & Licensing Department at 412-393-5203.

Sincerely,


James E. Cross

Attachment

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

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.

ATTACHMENT 1

Duquesne Light Company Beaver Valley Power Station Units 1 and 2 Additional Requested Information on Proposed Change to the Operations Quality Assurance Program Description

Overview:

In its June 25, 1999 submittal, Duquesne Light Company (DLC) proposed to limit required Onsite Safety Committee (OSC) reviews of new procedures, and procedure revisions, to those requiring a completed 10 CFR 50.59 safety evaluation. Those procedure reviews not requiring a completed 10 CFR 50.59 safety evaluation would be performed by an Independent Qualified Reviewer (IQR) and approved by the responsible discipline manager or his/her designee.

NRC Information Request:

NRC has requested that additional clarification be provided regarding the qualification and training requirements for IQRs. Specifically, the proposed change does not specify that procedures be reviewed by individuals qualified to the same level as the OSC reviewers being replaced nor are the training requirements for 10 CFR 50.59 review sufficiently defined.

DLC Response:

Equivalency of IQR Process Versus OSC Review Process

The primary role of an IQR shall be to facilitate the revision process. It shall be the IQR's responsibility to evaluate the changes being proposed and ensure that an appropriate level of technical review is performed. It shall not be necessary for the IQR to personally perform these reviews nor shall it be necessary for the IQR to possess the technical background needed to perform these reviews. The IQR shall be competent in technical matters related to plant safety and other engineering and scientific support aspects. In the event that the IQR is not qualified to deal with specific problems, the IQR shall ensure that the services of qualified individuals are engaged, as appropriate. The IQR's qualifications are described in ANSI/ANS 18.1-1971, Section 4.2.4 as those of a Technical Manager.

This QA Program Description change revises responsibility for procedure approval from the Plant Manager to an appropriate responsible discipline manager.

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Requisite Qualifications of an IQR

IQRs shall meet the applicable qualifications of ANSI/ANS 18.1-1971, Section 4.2.4 for a Technical Manager.

IQRs shall be qualified to perform 10 CFR 50.59 safety evaluations under a training program which meets the requirements of ANSI/ANS 18.1-1971, Section 5.3, as outlined in plant administrative procedures.

Personnel recommended to be IQRs shall be reviewed by the OSC and approved and documented by the Plant Manager as specified in administrative procedures.

Requisite Qualifications of a Responsible Discipline Manager

Responsible Discipline Managers having authority to approve procedures, including any designee, shall meet the applicable qualifications of ANSI/ANS 18.1-1971, Section 4.2.4 for a Technical Manager.

Authority and Review Responsibilities of an IQR

Each procedure or revision thereto of Technical Specification 6.8.1 shall be reviewed and approved, as described below, prior to implementation.

Each procedure or revision thereto shall be reviewed by an IQR, who is knowledgeable in the functional area affected. This IQR is not the individual who prepared the procedure or associated procedure revision. The IQR shall ensure that cross disciplinary reviews of new procedures and procedure revisions appropriate to the procedure change being proposed are completed prior to approval of the procedure. The responsible IQR shall ensure each procedure or revision thereto includes a determination of whether a procedure requires a 10 CFR 50.59 safety evaluation. If a procedure or revision thereto requires a completed 10 CFR 50.59 safety evaluation, the Responsible Discipline Manager or his designee shall ensure that the procedure, with the associated 10 CFR 50.59 safety evaluation, is forwarded to the OSC for review. Pursuant to 10 CFR 50.59, NRC approval of items involving unreviewed safety questions shall be obtained prior to approval of the procedure or revision thereto for implementation. Final procedure approval shall be by the Responsible Discipline Manager or his designee as specified in administrative procedures.

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BVPS-2 UFSAR

Revision (TBD)

17.2.1.3 Onsite Safety Committee (OSC)

The OSC shall function to advise the Division Vice President, Nuclear Operations Group and Plant Manager ~~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.

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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 or changes to existing procedures, thereto which 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 Division Vice President, Nuclear Operations Group and Plant Manager 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 Division Vice President, Nuclear Operations Group and Plant Manager General Manager, Nuclear Operations written approval or disapproval of items considered under OSC responsibility 1 through 4 above.

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- 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 Division Vice President, Nuclear Operations Group and Plant Manager General Manager, Nuclear Operations; however, the Division Vice President, Nuclear Operations Group and Plant Manager General Manager, Nuclear Operations shall have responsibility for resolution of such disagreements pursuant to Technical Specification 6.1.1.**

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

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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 Division Vice President, Nuclear Operations Group and Plant Manager 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 or revision thereto of Technical Specification 6.8.1 shall be reviewed and approved, as described below, prior to implementation.

Each procedure or revision thereto shall be reviewed by an Independent Qualified Reviewer (IQR), who is knowledgeable in the functional area affected. This IQR is not the individual who prepared the procedure or associated procedure revision. The IQR shall ensure that cross disciplinary reviews of new procedures and procedure revisions are completed prior to approval of the procedure.

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The responsible IOR shall ensure each procedure or revision thereto includes a determination of whether a procedure requires a 10 CFR 50.59 safety evaluation. If a procedure or revision thereto requires a 10 CFR 50.59 safety evaluation, the Responsible Discipline Manager or his designee shall ensure that the procedure, with the associated 10 CFR 50.59 safety evaluation, is forwarded to the OSC for review. Pursuant to 10 CFR 50.59, NRC approval of items involving unreviewed safety questions shall be obtained prior to approval of the procedure or revision thereto for implementation. Final procedure approval shall be by the Responsible Discipline Manager or his designee, as specified in administrative procedures.

IQRs shall meet the applicable qualifications of ANSI/ANS 18.1-1971, Section 4.2.4 for a Technical Manager. IQRs shall be qualified to perform 10 CFR 50.59 safety evaluations under a training program which meets the requirements of ANSI/ANS 18.1-1971, Section 5.3. Personnel recommended to be IQRs shall be reviewed by the OSC and approved and documented by the Plant Manager as specified in administrative procedures. Responsible Discipline Managers having authority to approve procedures, including any designee, shall meet the applicable qualifications of ANSI/ANS 18.1-1971, Section 4.2.4 for a Technical Manager.

~~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 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 persons will be a member of supervision. If the change affects operations procedures, at least one of these persons will hold 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.

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~~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.~~