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July 31, 1981

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

ATTENTION: Mr. Darrell G. Eisenhut, Director

SUBJECT: Beaver Valley Power Station - Unit No. 2
Docket 50-412, CPPR 105
USNRC Generic Letter 81-01
Qualification of Inspection, Examination, and Testing
and Audit Personnel



Gentlemen:

This letter is in response to your generic letter 81-01 which requested our position on Regulatory Guides 1.58 revision 1 (positions C.5, 6, 7, 8, and 10) and 1.146 (August 1980).

REGULATORY GUIDE 1.58 Revision 1

Position C.5 Unit 2 Level III personnel are capable of reviewing and approving inspection, examination, and testing procedures and of evaluating the adequacy of such procedures to accomplish the inspection, examination, and testing objectives.

Position C.6 and C.10 The initial qualifications of individuals to Levels I, II, or III will generally be to the education and experience recommendations of ANSI N 45.2.6-1978. However, in certain instances as determined by appropriate management, qualifications may alternatively be determined through test results and/or demonstration of capabilities. Appropriate documentation will be generated for all qualifications.

Individual requalifications will meet or exceed the recommendation of the standard.

Paragraph 3.5.1 of the Standard lists recommended education and experience for qualification to Level I. Unit 2 will also accept a four year college degree plus one month of related experience or equivalent inspection, examination, or testing activities.

Position C.7 The method of qualification at the site is to qualify personnel to a specific inspection, examination, or test function rather than to a generic type discipline. As a result, any individual utilized on a test or inspection will have been qualified to that specific task. Unit 2 meets the intent of this requirement.

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Mr. Darrell G. Eisenhut
Generic Letter 81-01
July 31, 1981
Page 2

Position C.8 At present, there is no radioactive material on the construction site except for radiography material which is controlled by an ALARA program. When fuel is loaded, the Operations Quality Assurance Program will be in effect and will institute an ALARA program for the site. Beaver Valley Unit 2 meets the intent of this requirement.

SUMMARY As of January 1, 1982, all procedure revisions necessary to meet or exceed the requirements of the Regulatory Guide will be completed and implemented.

REGULATORY GUIDE 1.146 AUGUST 1980

As of January 1, 1982, the Duquesne Light Company Quality Assurance Department will comply with the requirements of Regulatory Guide 1.146 (August 1980) with the exception of one individual.

The individual will be qualified as an audit team leader under the existing Duquesne Light Company Quality Assurance Department Program. This individual will (1) meet the ANSI N45.2.23 requirements for education, rights of management, and communication skills, (2) have received training to the extent necessary to assure her competence in auditing skill, (3) have passed a lead auditor examination, and (4) have participated in a minimum of five (5) nuclear quality assurance audits before being assigned as an audit team leader. When acting as an audit team leader, she will be accompanied by an individual qualified as a lead auditor in accordance with ANSI N45.2.23 - 1978.

DUQUESNE LIGHT COMPANY

By


E. J. Woolever

cc: Mr. V. Stello, Director (15)
Office of Inspection and Enforcement
Mr. B. H. Grier, Director
Region 1
Mr. K. Jabbour, Project Manager
Licensing and Review