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April 15, 1983

United States Nuclear Regulatory Commission  
Washington, DC 20555

ATTENTION: Mr. Darrell G. Eisenhut, Director  
Division of Licensing

SUBJECT: Beaver Valley Power Station - Unit No. 2  
Docket No. 50-412  
Generic Letter 82-33  
Supplement 1 to NUREG 0737  
Requirements for Emergency Response Capability

Gentlemen:

The attached report is the Beaver Valley Power Station Unit No. 2 (BVPS-2) response to your letter titled "Supplement 1 to NUREG 0737 Requirements for Emergency Response Capability" (Generic Letter 82-33) dated December 17, 1982. This report addresses each of the items outlined in your letter and provides the information required regarding the response to the various requirements of Supplement 1 to NUREG 0737. The proposed "Summary Network Schedule" (Fig. 2-1) for implementation and integration has been developed following the guidelines contained in Generic Letter 82-33 and the NRC Region I guidance provided at the NRC Region I meeting to discuss Generic Letter 82-33 held February 21, 1983.

It is recognized that as stated in Generic letter 82-33 the provisions for scheduling supercede any previous NUREG 0737 schedules pertaining to these items.

BVPS-2 is currently under construction and the dates for the activities listed in the report affect the construction schedule. The NRC has provided the durations of its various review activities, and these reviews have also been accounted for in the construction schedule. They are explicitly shown in each activity description.

The Duquesne Light Company welcomes this opportunity to work with the NRC in establishing realistic plant-specific schedules. As indicated in your letter, implementing generic deadlines does not permit a utility to make the most efficient use of its staff when trying to integrate many related tasks. This approach by the NRC is viewed as a step in the right

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direction to permit both the NRC and the electric utility industry to maximize their resources, be responsive to the issue of emergency response capability and improve our ability to work together and get the job done.

DUQUESNE LIGHT COMPANY

By E. J. Woolever  
E. J. Woolever  
Vice President

SDH/wjs  
Attachment

cc: Ms. L. Lazo, Project Manager (w/attachment)  
Mr. G. Walton, Resident Inspector "

COMMONWEALTH OF PENNSYLVANIA )  
 ) SS:  
COUNTY OF ALLEGHENY )

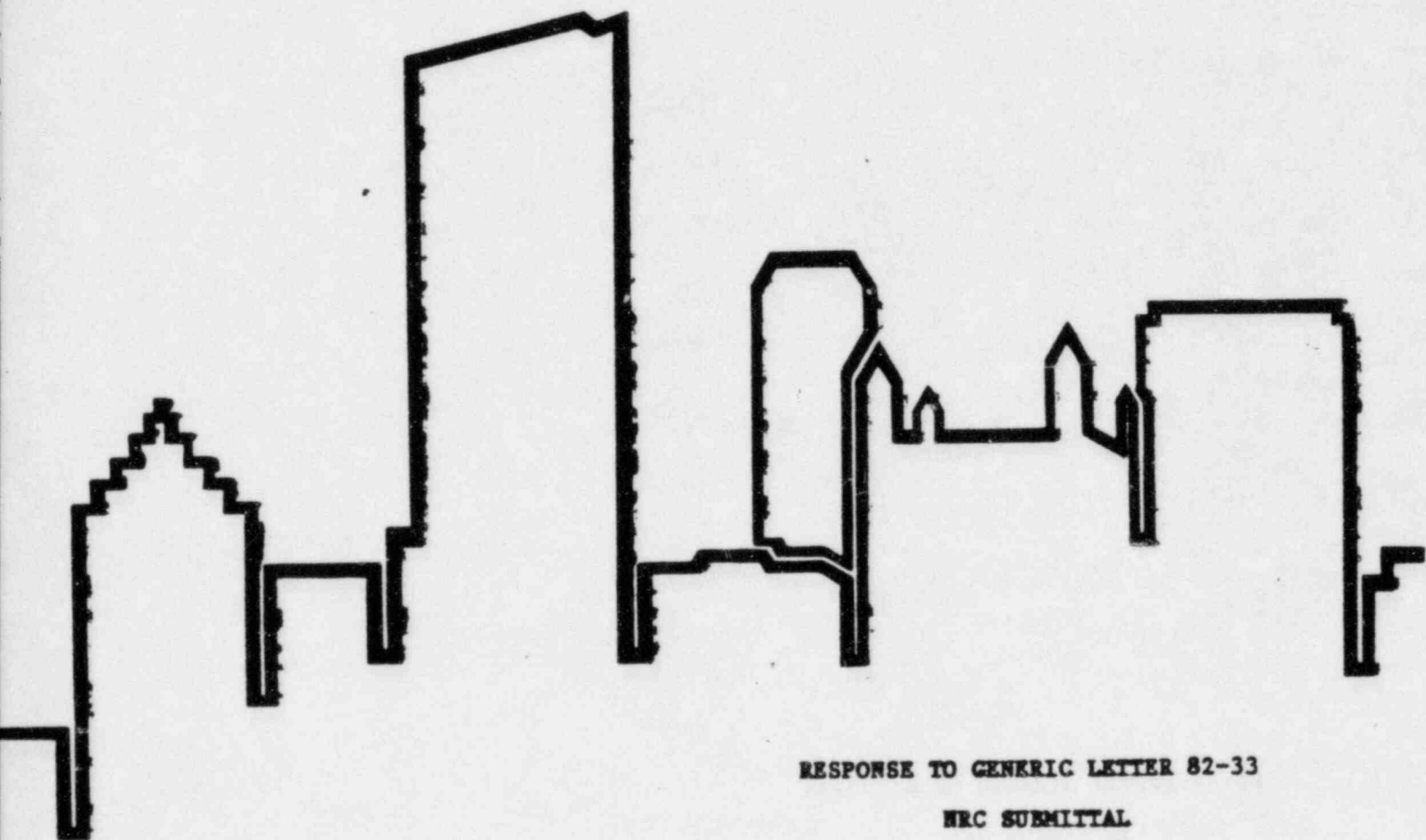
On this 13th day of April, 1983, before me, a Notary Public in and for said Commonwealth and County, personally appeared E. J. Woolever, who being duly sworn, deposed and said that (1) he is Vice President of Duquesne Light, (2) he is duly authorized to execute and file the foregoing Submittal on behalf of said Company, and (3) the statements set forth in the Submittal are true and correct to the best of his knowledge.

Anita Elaine Ritter  
Notary Public

ANITA ELAINE REITER, NOTARY PUBLIC  
ROBINSON TOWNSHIP, ALLEGHENY COUNTY  
MY COMMISSION EXPIRES OCTOBER 20, 1986



# Duquesne Light



RESPONSE TO GENERIC LETTER 82-33

NRC SUBMITTAL

Beaver Valley Power Station - Unit No. 2  
Duquesne Light Company

April 15, 1983

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FIG. 2-I Network Summary

## SECTION 1

### INTRODUCTION

Generic Letter 82-33 published Supplement 1 to NUREG-0737 and requested engineering and scheduling information for the five action items described. This report presents Duquesne Light Company's approach to meeting the requirements of Supplement 1 for Beaver Valley Power Station - Unit No. 2.

The report describes the interrelationships among activities, the expected commitments from the NRC for review of the various submittals, and the various descriptions and dates required by Generic Letter 82-33.

The interrelationships among activities suggested in Supplement 1 are not appropriate to the current construction and engineering status of BVPS-2, and consequently, the sequence of activities described in this report will be implemented. This sequence is designed to provide for completion of all activities, including NRC review, prior to the scheduled December 31, 1985, fuel load date.



## SECTION 2

### DESCRIPTIONS AND SCHEDULES

#### 2.1 Safety Parameter Display System

##### 2.1.1 Schedule and Current Status

The Safety Parameter Display System will operate from the Emergency Response Facilities Computer System. Currently, a specification for hardware and software has been written, and will be released for bids. An SPDS implementation plan and the safety analysis which describes the basis for parameter selection will be submitted by August 1, 1984. The SPDS will be operational by October 7, 1985. Software and hardware design will be fixed by May 1, 1984, and will be available for use in the other activities at that time. Operator training will be complete by December 1, 1985. DLC does not desire a pre-implementation review. Refer to Figure 2-1 for a network which shows the integration schedule for all activities.

##### 2.1.2 NRC Review

The three NRC review tasks, along with their schedules for completion, are listed below:

###### - Implementation Plan

Submit to NRC: 8-1-84

NRC review complete: 10-1-84

###### - Safety Analysis Report

Submit to NRC: 8-1-84

NRC review complete: 10-1-84

###### - Post-Implementation Review

NRC start review: 10-1-85

NRC complete review: 12-1-85

NRC issue SER: 12-1-85

##### 2.1.3 Integration with Other Activities

The SPDS for EVPS-2 is being planned for completion and installation unrestrained by progress in any of the other four activities. The various design documents developed for the SPDS will serve as inputs to other activities. The SPDS is expected to be the means of resolving certain types of Human Engineering Discrepancies found during the DCRDR.

## 2.2 Detailed Control Room Design Review

### 2.2.1 Schedule and Current Status

Resources required to conduct the Detailed Control Room Design Review and technical requirements are currently being evaluated. The DCRDR Program Plan will be submitted by September 1, 1983. The DCRDR summary report will be submitted by June 1, 1985.

### 2.2.2 NRC Review

Two reviews are required by the NRC:

#### - Program Plan

Submit to NRC: 9-1-83  
NRC review complete: 11-1-83

#### - Summary Report

Submit to NRC: 6-1-85  
NRC review complete: 8-1-85  
NRC issue SER: 8-1-85

### 2.2.3 Integration with Other Activities

The DCRDR review phase will take place late in the project schedule. Although NRC guidance suggests that the planning phase report be submitted within two months of the start of the review, DLC has chosen to complete the planning phase early to identify and allocate resources required during the review in an efficient manner. The start of the DCRDR Review Phase is restrained by the availability of operators, procedures, and control room equipment. It will be started, however, in sufficient time to allow for submittal of the Summary Report by June 1, 1985.

## 2.3 Regulatory Guide 1.97 Instrumentation

### 2.3.1 Schedule and Current Status

The report and summary tables describing implementation of Regulatory Guide 1.97 are contained in the BVPS-2 FSAR, Section 7.5. Detailed tables listing all instrumentation, and deviations with their supporting justification will be provided by September 15, 1983. Instrumentation listed in the tables will be installed and operational by December 31, 1985.

### 2.3.2 NRC Review

There is one review required by the NRC:

#### - Implementation Plan

Submit to NRC: 9-15-83  
NRC review complete: 11-15-83  
NRC issue SER: 11-15-83

### 2.3.3 Integration with Other Activities

Engineering studies using Regulatory Guide 1.97 (Rev. 2) were performed and completed to support preparation of BVPS-2 Final Safety Analysis Report, Section 7.5. These studies and the engineering and design information derived from them, will be used as information inputs to the other four activities.

## 2.4 Emergency Operating Procedures Upgrade

### 2.4.1 Schedule and Current Status

Westinghouse Owners Group generic technical guidelines will be the basis for BVPS-2 EOP's. They have been submitted to the NRC. The procedures generation package will be submitted by August 1, 1984. The integrated training plan will be initiated by August 1, 1984. Operators will be licensed using upgraded EOP's.

### 2.4.2 NRC Review

The NRC review tasks, along with their schedules for completion, are shown below:

#### - BVPS-2 Procedures Generation Package

Submit to NRC: 8-1-84  
NRC review complete: 10-1-84

### 2.4.3 Integration with Other Activities

Upgraded EOP's, developed from the Westinghouse Owners' Group generic Emergency Response Guidelines, will use plant information identified in the Regulatory Guide 1.97 engineering studies. Initially, the EOP's will be developed without the operation of the SPDS considered. When the SPDS software becomes available, it will be reviewed for possible incorporation into the EOP's.

## 2.5 Emergency Response Facilities

### 2.5.1 Schedule and Current Status

The ERF's that support operation of BVPS-2 are shared facilities designated as site ERF's. Refer to DLC's submittal for BVPS-1 for details of ERF construction. Structure, procedures, and staff training actions will be completed in time for the June 1, 1985, site drill. Since the ERF computer system and



SPDS will not be available until October, 1985, NRC assessment of these activities should be performed in two phases.

#### 2.5.2 NRC Review

The quality of ERF installation will be appraised by the NRC. Actions concerning structure, procedures, and staff training will be complete prior to June 1, 1985, when the Site Drill will be conducted. The NRC should plan on appraising these aspects of the ERF's during this site drill. The instrumentation system for the TSC and EOF will be installed and operational by December 31, 1985. The NRC will be performing site audits during the time periods indicated.

#### 2.5.3 Integration with Other Activities

Refer to Figure 2-1 for the integration schedule of the ERF instrumentation system.

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