

Duquesne Light Company

Beaver Valley Power Station
P.O. Box 4
Shippingport, PA 15077-0004

February 19, 1993

JOHN D. SIEBER
Senior Vice President and
Chief Nuclear Officer
Nuclear Power Division

(412) 393-5255
Fax (412) 643-8069

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66
Supplement 1 to Generic Letter 87-02 on
SQUG Resolution of USI A-46 (TAC/69428)

By letter dated September 22, 1992, Duquesne Light Company provided a commitment to the SQUG Generic Implementation Procedure (GIP) in response to Supplement 1 to Generic Letter 87-02. On November 25, 1992, the NRC transmitted the Safety Evaluation related to our response and stated the NRC's interpretation. This letter responds to the NRC's interpretation and clarifies our previous response.

The NRC interpreted our response as a commitment to the entire GIP-2, including both the SQUG commitments and the implementation guidance. Duquesne Light Company concurs with the NRC's interpretation. We note in the NRC's January 20, 1993 response to the SQUG that "The staff acknowledges that such a commitment does not preclude a licensee from deviating from the GIP-2 implementation guidance if any such deviations are in accordance with GIP-2, Part I, Section 1.3, as supplemented by the staff's SSER No. 2."

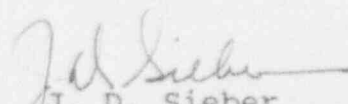
Additionally, Duquesne Light Company will follow the August 21, 1992, SQUG letter for implementing GIP-2 and will also reference the NRC staff's October 2, 1992, response to the SQUG letter.

We also note that Duquesne Light Company does not intend to change the Beaver Valley Power Station, Unit No. 1 licensing basis to reflect a commitment to the USI A-46 methodology prior to receipt of the NRC staff's plant specific safety evaluation.

Should you have any questions regarding this submittal, please contact Ed Coholich at (412) 393-5224.

Sincerely,

610150


J. D. Sieber

cc: Mr. L. W. Rossbach, Sr. Resident Inspector
Mr. T. T. Martin, NRC Region I Administrator
Mr. G. E. Edison, Project Manager
Mr. M. L. Bowling (VEPCO)

9303020368 930219
PDR ADOCK 05000334
P PDR



4025 1/0