

Duquesne Light Company

Beaver Valley Power Station
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U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
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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
NRC Operational Safety Team Inspection, NRC Region I
Inspection Report Nos. 50-334/94-80 and 50-412/94-80

The following information is provided in response to NRC letter dated May 6, 1994 which transmitted the report of the Operational Safety Team Inspection, conducted from February 28 - March 4, 1994, and March 14-18, 1994, at the Beaver Valley Power Station Units 1 and 2. Duquesne Light Company (DLC) was requested to provide our plans to enhance the root cause evaluation process for human performance-related events.

A number of actions are planned to enhance the overall root cause evaluation process for Beaver Valley Power Station. Over the next several months the root cause investigation methodology will be reviewed and revised using NUREG/CR-5455, Development of the NRC's Human Performance Investigation Process, as well as other industry good practices. The new methodology will incorporate the consideration of human performance as an integral part of root cause investigations. A training program will be developed based on the revised root cause evaluation process, and a selected group of individuals will be trained. When human performance issues are identified, corrective actions will be developed to address the problems.

The ISEG will continue to utilize their current root cause methodology, which includes human performance as a potential root cause, to perform independent reviews in accordance with the ISEG charter. ISEG procedural guidance allows for the use of other root cause methodologies when it is determined to be appropriate for the event being analyzed.

In parallel with the efforts to improve the root cause methodology, a Human Performance Improvement Plan has been initiated. All department managers have been required to prepare a



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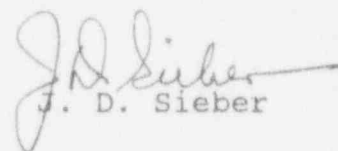
human performance improvement plan specific to their department's needs. These plans are to include the use of self-checking programs and will expand capabilities for human performance reviews. As a minimum, this would include the training of qualified individuals in appropriate departments to perform root cause analysis evaluations. The individual department plans have been collected and are being used to formulate the overall site plan by August 1, 1994.

In addition, a review of the INPO Significant Operating Experience Report (SOER) 92-1, Reducing the Occurrence of Plant Events Through Improved Human Performance, will be performed by August 31, 1994. This report describes lessons learned by utilities in addressing the principal causes of human performance problems. The recommendations from this report are intended to reduce human error through the implementation of effective administrative programs and training.

The Beaver Valley Power Station self-assessment conducted by the Program Review Team during the fourth quarter of 1993 and QA Audit BV-C-93-03 identified root cause analysis and corrective actions as an area that required improvement. As a follow-up to this finding by the Review Team, the area of root cause analysis will receive special attention by independent oversight organizations to insure that corrective actions are effective with specific emphasis on human performance.

If you have any questions concerning the above response, please contact Drexel Williams at (412) 393-5226.

Sincerely,


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. J. T. Wiggins, Deputy Director, Division of Reactor Safety