

**Duquesne Light**

Nuclear Division  
P.O. Box 4  
Shippingport, PA 15077-0004

Telephone (412) 456-6000

March 2, 1983

United States Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Attn: R. C. Haynes, Regional Administrator  
Region I  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Reference: Beaver Valley Power Station, Unit No. 1  
Docket No. 50-334, License No. DPR-66  
Systematic Assessment of Licensee Performance

Gentlemen:

In accordance with the instructions in your letter of February 7, 1983 which forwarded the results of the NRC Region I SALP Board review of the operation of Beaver Valley Unit 1, we offer the following comments.

In general, we believe the 1982 SALP report is comprehensive and objectively evaluates the performance of Beaver Valley Unit 1 personnel and the condition of the plant and equipment. We have discussed our plans to improve procedure adherence, fire protection and licensed operator staffing with appropriate members of your staff at the February 15, 1983 meeting held at our site. We recognize the areas as requiring improvement and will take the necessary steps to improve our effectiveness in these areas.

With regard to Item 5 (Fire Protection and Housekeeping), we respectfully request reconsideration of the rating given. The basis for our belief that reconsideration is warranted is the following:

- 1) Based upon the observations cited in the SALP report, we do not believe sufficient consideration was given to all elements which make up an effective fire prevention program to determine the rating in this area.
- 2) Based upon our review of inspection reports related to fire protection, we do not find documentation that a substantial expenditure of inspection manhours was made in this area; nor were there an abnormally large number of violations which would indicate programmatic breakdown.

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- 3) While we agree that fire protection deficiencies are important, we believe that most of the inspector comments relate to administrative matters while other comments are not of major significance in the fire posture of the station.
- 4) We believe Inspection 82-30 was hampered in that the inspector did not have access to the appropriate Company personnel for a majority of the inspection visit; nor did he achieve a full understanding of our training in this area. We further believe that a fully trained fire brigade of the minimum required size was always available on each operating shift. This is a result of the large number of personnel who participate in our fire fighting training program.
- 5) We believe our record shows substantial improvement in control of fire barriers and in housekeeping during the SALP rating period, especially in light of a major outage which occurred during the period. We believe credit should be allowed for the increased management attention and worker cooperation that brought about this improvement. While we understand Inspection 82-30 focused on fire brigade training and our administrative procedures which describe the duties of the Fire and Safety Engineer, we believe the forty-two (42) ANI inspections and reviews coordinated and responded to by our Fire Protection Group during the rating did constitute meaningful activities in strengthening the overall fire posture of the plant. This is in addition to time spent on NEIL and INPO during this same period. In recognition of the large workload in this area, we recruited and hired a second fully qualified Fire Protection Engineer toward the end of the rating period.
- 6) During the entire 1982 outage, three full-time safety engineers were added to work with the major contractor who performed work in the plant to assure compliance with the requirements of the Station Fire Protection Program. In addition, one individual on each shift was assigned the full-time responsibility of inspecting all fire doors to verify they were in satisfactory condition and that fire watches were posted at opened fire doors.

- 7) We recognized the importance of the Fire Protection Program and made several organizational changes to bring about overall program improvement. Inspection 82-30, conducted soon after these organizational changes, identified shortcomings which are solely related to organizational transition.

In its reconsideration of this category, we believe it is important for the Board to consider the following items in order to arrive at a more comprehensive evaluation:

\* Appendix R Compliance

Even though we are required, by law, to comply only with Items G, J and O of Appendix R (since we were licensed to operate prior to January, 1979), we internally instituted upon ourselves all the requirements of Appendix R (Items A through O) and our Fire Protection Plan reflects this fact.

The Appendix R Fire Protection Review Report we recently submitted to the NRC provides commitments to upgrade, even further, our fire protection program. We have already completed modifications for the installation of emergency lighting and the Reactor Coolant Pump oil collection system; in the future, we will upgrade our plant to comply with Item G, "Safe Shutdown Capability".

\* Our Efforts To Comply With Past NRC Regulation

Standard Review Plan 9.5-1, Appendix A, and the NRC's Safety Evaluation Report of May, 1979 required numerous fire protection modifications and upgrading; we complied with them all within the committed implementation dates. The total cost of these efforts has exceeded \$20 million over the past three-year period. Examples include:

- 1) Water suppression and detection systems for
  - Reactor Containment Building (RHR pump area and cable penetration area)
  - Auxiliary Feedwater Pump area
  - CCR Pump area
- 2) Smoke detection coverage for
  - Charging Pump cubicles
  - Intake Structure pump cubicles
  - Vertical control board panels in the Control Room
  - Cable Tunnel area
- 3) Upgrading fire dampers for the Control Room and perimeter areas
- 4) Re-routing and separating vital redundant safety-related power and control cables
- 5) Installation of a Halon suppression system in the under-floor cable area of the Process Instrument Room
- 6) Hose rack standpipe installations for water coverage in the Control Room, Cable Spreading Room, Cable Vaults and various other areas throughout the plant
- 7) Upgrading our Fire Brigade equipment and facilities
- 8) Administratively upgrading our Fire Protection Program to include:
  - Pre-fire plan strategies
  - Hot work permit system
  - Control of flammable liquids and combustibles, non-treated wood, etc.
  - Transient fire loadings in safety-related areas
- 9) Various other programs to comply with NRC fire protection regulations

\* Fire Barrier Penetrations

Since 1978, as a result of continual design change and modification efforts in the plant, we have had a full-time contractor (Chemtrol) onsite to install fire sealant material in open penetrations and conduits in safety-related areas. This effort is estimated annually to be approximately \$160,000 for labor + materials.

\* Fire Brigade Drills And Training

Our Brigade personnel and/or the local fire companies have demonstrated their ability to respond to three fire emergencies (main transformer, waste basket in storeroom, and trailer fire in switch yard).

- 1) Qualification of Practical Fire Fighting instructor, Mr. William Monac (Fire Chief of the Midland Fire Department)
  - Experienced fireman for 23 years (15 years as Fire Chief)
  - Member of NFPA
  - Member of Institute of Fire Service Instructors
  - Accredited in State Of Pennsylvania as instructor for self-contained breathing apparatus
  - B.S. degree in General Studies and Life Safety at Kent State; Associate Degree in Criminal Justice from Kent State
  - Fire Code Inspector and Arson Code Inspector, Qualified by Penn State University
  - Various fire and safety seminars from State of Pennsylvania

\* Present Fire And Safety Engineer Personnel

- 1) Mr. George Svaranowic
  - Member of Society of Fire Protection Engineers
  - P.E. license from State of Pennsylvania
  - Factory Mutual-qualified fire inspector
  - Total of 16 years fire protection inspection, engineering and field work
  - B.S. degree in Petroleum Engineering at University of Pittsburgh



2) Mr. Joe Tyskewicz

- Safety Engineer at Shippingport Atomic Power Station for seven years
- Advisory member of DLCo General Safety Committee
- B.A. degree in Biology from St. Vincent College

\* Manpower Allocation To Fire Protection Systems

- 3,000 man hours/year for operational surveillance testing of fire protection equipment and systems
- Daily inspection tours by Operations personnel for fire hazards, etc.; also, periodic inspection tours by fire protection engineering personnel
- 188 man hours/year for preventive and corrective maintenance
- 164 man hours/year by instrument and control maintenance personnel for calibrations, etc.
- Two (2) full-time fire protection engineers onsite

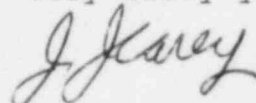
NOTE: This manpower allocation far exceeds inspection/surveillance efforts of any single safety system at our facility.

\* Mutual Aid Fire Plan

The Mutual Aid Fire Plan Program for offsite fire department assistance, which was initiated in 1976 and was noted by NRC Staff reviewers as the "best they have seen", is still part of our fire protection program and is tested annually. The four local fire departments have proven their ability to coordinate fire fighting activities with our onsite Brigade personnel and to respond within 15 minutes of call-out.

In conclusion, it is our opinion a Category III rating is inappropriate for our Fire Protection and Housekeeping Area for the 1982 SALP period.

Very truly yours,



J. J. Carey  
Vice President - Nuclear

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cc: W. M. Troskoski, Resident Inspector  
U. S. Nuclear Regulatory Commission  
Beaver Valley Power Station  
Shippingport, PA 15077

U. S. Nuclear Regulatory Commission  
c/o Document Management Branch  
Washington, D. C. 20555