

Duquesne Light Company

Beaver Valley Power Station
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May 1, 1991

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Vice President - Nuclear Group

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U. S. Nuclear Regulatory Commission
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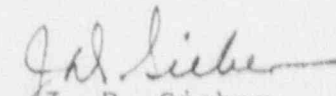
Subject: Beaver Valley Power Station, Unit No. 1 and No. 2
BV-1 Docket No. 50-334, License No. DPR-66
BV-2 Docket No. 50-412, License No. NPF-73
Combined Inspection Report Nos. 50-334/90-80 and
50-412/90-80

Attached is a status of our actions taken in response to the above referenced NRC Inspection of the Beaver Valley Power Station Emergency Operating Procedures (EOPs).

Our initial response, dated July 13, 1990, provided an action item schedule for addressing the areas of weakness identified in the Inspection Report. Note that this update revises our target date for completing a major revision to the EOPs. The approval for the revision to the Unit 2 EOPs is now targeted for June 21, 1991.

If there are any questions concerning this response, please contact Charles O'Neill at (412) 393-4935.

Sincerely,


J. D. Sieber
Vice President
Nuclear Group

Attachment

cc: Mr. J. Beall, Sr. Resident Inspector
Mr. T. T. Martin, NRC Region I Administrator
Mr. R. M. Gallo, Chief Operations Branch,
Division of Reactor Safety
Mr. A. W. DeAgazio, Project Manager
Mr. R. Saunders (VEPCO)
Mr. L. E. Briggs, NRC Region I, Senior Operations Engineer

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Attachment 1

EOP Audit Open Item Status

<u>NRC Item No.</u>	<u>Paragraph</u>	<u>Description</u>
90-80-01	3.4	Discussed in Para. 3.3.a. Develop more fully detailed deviation justification.

Status

All deviation sheets were reviewed/updated as they were input into the EOP computer. This item is complete except for the changes to be made as a result of Item 90-80-07.

<u>NRC Item No.</u>	<u>Paragraph</u>	<u>Description</u>
90-80-02	3.4, 5.3	Discussed in Para. 3.3.c and 3.3.d. Correct Note and Caution statement placement and use. Upgrade Writer's Guide to address level of detail concerning local operations and develop means to keep track of Continuous Action Statements in effect.

Status

All Cautions and Notes have been reviewed to ensure they immediately proceed the step to which they apply and all Cautions have been reviewed to ensure that they don't contain action steps. In addition, the Procedure Generation Package (PGP) has been revised to include adequate guidance for directing local operator actions. This portion of the item is complete. A fold out page has been developed but has not yet been implemented. This item will be completed during the upcoming revision.

<u>NRC Item No.</u>	<u>Paragraph</u>	<u>Description</u>
90-80-03	4.4	Discussed in Para. 4.3.a thru d. Upgrade level of detail in procedures and attachments that require local actions. Review and correct procedures directly referenced by the EOPs to ensure appropriateness. Identify and correct valve labeling. Develop EOP attachments to address lengthy local operations.

Status

A walkdown checklist has been developed and has been used to walkdown all BV-1 EOP attachments and BV-1 AOPs. Approximately 500 discrepancies were identified and resolutions recommended by the procedures group. These resolutions require BV-1 operations review and approval prior to implementation.

There have been three BV-2 EOP attachments that have been walked down and those attachments have been revised accordingly.

As stated in the prior letter to the NRC, all of the walk downs are not scheduled to be completed until September 1, 1992. The remainder of the Unit 2 EOP attachments, AOP, AOP attachments and satellite procedure walkdowns will be completed prior to that date.

Local valves called out by the EOPs, AOPs and EOP attachments have been identified to the Label/Tagging Coordinator. New valve tags are being procured from an offsite supplier.

The EOPs were reviewed to identify lengthy local operator actions. These lengthy actions were made into EOP attachments.

<u>NRC Item No.</u>	<u>Paragraph</u>	<u>Description</u>
90-80-04	5.4	Revise OM 1/2.48.1A to address personnel responsibilities during emergency conditions.

Status

OM 1/2.48.1A has been revised to address this concern. This item is complete.

<u>NRC Item No.</u>	<u>Paragraph</u>	<u>Description</u>
90-80-05	6.4	Discussed in Para. 6.3.1, b and c. Develop system to cross check any procedural change effect on EOPs. Strengthen feedback to personnel requesting procedure changes and resolve disagreement between temporary procedure change procedure and PGP.

Status

The PGP has been revised to allow the use of the OMCN to make technically significant changes to the EOPs.

The Beaver Valley Procedure Writer's Guide (PWG) includes a method to cross check EOP related procedures (satellite procedures) to the associated EOP. This ensures any change to an EOP related procedure is walked down using PGP guidance prior to issuance.

The EOP computer has been used to issue BV-2 EOPs and the AOPs for both units. Since the 1990 NRC audit, two minor EOP revisions and revisions to AOP 1.10.2 and AOP 2.10.2 have been issued using the EOP computer. The upcoming BV-2 EOP revision will be generated using the entire EOP computer capability and should make future revisions easier. This item is considered closed.

<u>NRC Item No.</u>	<u>Paragraph</u>	<u>Description</u>
90-80-06	6.4	Discussed in Para. 6.3.d and e. Strengthen PGP to address EOP training and V&V requirements. V&V to include walkdown of in-plant local operations.

Status

The PGP has been revised to define requirements for Table Top, Walkthrough and Simulator Validations. The walkthrough validation program has been revised to include a walkdown validation checklist that provides specific criteria to be checked while performing the walkdown.

The Nuclear Group Training Administration Manual (chapter 2 and 13) has been revised to address the training for non-licensed operators. This item is complete.

<u>NRC Item No.</u>	<u>Paragraph</u>	<u>Description</u>
90-80-07	NRC Att 2	Resolution of specific items identified in Attachment 2.

Status

NRC Attachment 2 identified 94 specific deficiencies identified with the BV-2 EOPs. All of these items have been reviewed and a resolution identified. 56 of these items have already been resolved (procedure change, better justification or further review showed that the existing procedure was correct). The remaining EOP items have resolutions identified and will be resolved during the upcoming revision.

As previously discussed, most of the BV-2 AOPs and EOP attachments have not yet been walked down and consequently, many of the remaining deficiencies (concerning BV-2 EOP attachments, AOPs and satellite procedures) have not been resolved. These walkdowns will begin immediately following the issuance of the BV-2 EOPs, and will be completed in accordance with the commitment to Item 90-80-03.

Attachment 2

BV-2 EOP Revision Milestones

<u>Action</u>	<u>Date</u>
1. Finish proofing EOP computer generated background document.	4/19/91
2. Include remaining NRC EOP changes in markup; EOPs, Backgrounds and Deviation sheets to typing.	4/26/91
3. Typing; form generation and approval for validation.	5/15/91
4. Table Top validation.	5/24/91
5. Incorporate validation changes; return to typing.	5/29/91
6. Typing; perform verification.	6/07/91
7. OSC approval.	6/14/91
8. Approval.	6/21/91

NOTE: Training on the revision must be performed prior to issuance and can NOT be conducted before OSC approval. Therefore, training will be conducted during the third quarter of 1991. Upon completion of training, the EOP revision will be issued for use.