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September 27, 1983

Director of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Attn: Mr. Darrell G. Eisenhut, Director
Division of Licensing
Washington, D. C. 20555

Reference: Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66
Generic Letter No. 82-33; Supplement 1 to NUREG-0737
Detailed Control Room Design Review

Gentlemen:

In accordance with your letter of December 17, 1982, Generic Letter No. 82-33, we are providing the Program Plan for the Implementation of the Control Room Design Review (CRDR) of the Beaver Valley Nuclear Power Station Unit-1 Nuclear Power Plant. The Program Plan was developed following the guidelines contained in Supplement 1 to NUREG-0737, Section 5, Detailed Control Room Design Review.

The attached Program Plan is also provided to fulfill a commitment made in our submittal of April 15, 1983 and as clarified in our submittal of July 25, 1983 with respect to the negotiated schedule for tasks identified in Supplement 1 to NUREG-0737, in particular, the submittal of a program plan for the CRDR. By preparing and submitting the information contained herein, Duquesne Light Company continues its efforts to meet the goals of the action plan items of Supplement 1 to NUREG-0737.

The BVPS-1 CRDR Program Plan makes use of the implementation methodology generated by the INPO NUTAC for CRDR. In this manner, the Program Plan incorporates a blend of the NRC guidance of NUREGs-0700, 0801 and 0737. Duquesne Light Company is actively participating in the CRDR NUTAC and believes that the NRC guidance has been adequately considered and properly incorporated in the NUTAC documents.

Two overall objectives guided the development of the BVPS-1 CRDR Plan. First, Duquesne Light Company recognized the importance of integrating all the action items addressed by Supplement 1 to NUREG-0737, such as, the new Emergency Operating Procedures, the Safety Parameter Display System, Regulatory Guide 1.97, Emergency Response Facilities and the CRDR. We have addressed this objective in our previous submittals and will continue to provide for the integration of these tasks as they relate to the CRDR.

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Secondly, as stated in NUREG-0660, Item I.D.1, the objective of the CRDR is to "improve the ability of nuclear power plant control room operators to prevent or cope with accidents if they occur by improving the information provided to them". Many design changes have already been implemented to enhance the operational safety and reliability of the plant. We must, however, evaluate identified human engineering discrepancies and temper the need for potential modifications with consideration given to the experience gained to date with the existing control board and associated instrumentation. In addition, the BV-1 Simulator, for which the control boards are already manufactured, will be considered when potential modifications to the control room boards are evaluated as any modifications will affect both boards. We fully intend to disposition all significant discrepancies with respect to the relative safety impact of each item and the most cost effective and beneficial means available. Notwithstanding, Duquesne Light Company considers that it has devised an effective methodology in the Program Plan to accomplish these objectives. To further enable us in meeting this objective, we identify in the Program Plan a multi-disciplinary review team of Duquesne Light Company personnel who have the competence to successfully conduct the CRDR.

One of the more salient objectives of the CRDR is the identification of human engineering discrepancies. The application of human factors principles to accomplish this objective adds a new dimension to our efforts. We have reviewed the requisites for human factors specialists (HFS) and are currently soliciting bids from contractors who can provide us with these services. Once a contractor is selected, an HFS will become an active participant in the CRDR. By providing for the participation of the HFS along with the use of guidance provided by the various NUREGs and INPO documents, we have established a review program incorporating accepted human factors principles.

Duquesne Light Company has addressed all the major aspects of an effective CRDR in the attached Program Plan while making efficient use of its staff. It is recognized that no amount of planning can account for all eventualities that might occur during an extensive review program as the CRDR. An important aspect of the Program Plan, therefore, is that it remain sufficiently flexible to be modified, if needed. Any significant modifications will be identified in the CRDR Summary Report. However, such flexibility in the Program Plan will not be interpreted to allow deviations from the intended purpose and objectives of the CRDR.

If you have any questions regarding this submittal, please contact our Nuclear Safety and Licensing Department.

Very truly yours,

J. J. Carey
Vice President, Nuclear

Attachment

cc: Mr. W. M. Troskoski, Resident Inspector
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c/o Document Management Branch
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