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April 30, 1984

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

Reference: Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66
Nuclear Regulatory Commission Letter dated January 4, 1984
Staff Comments on the Beaver Valley 1 CRDR Program Plan

Gentlemen:

In accordance with your letter of January 4, 1984, we are providing the approximate starting dates for each of the review phases of the Control Room Design Review (CRDR) for the Beaver Valley Nuclear Power Station Unit-1 (BVPS-1). The information contained herein is to a level of detail which we believe will be of the most use to the Staff in planning and scheduling its audit of the CRDR.

Planning Phase

The final planning phase began on a preliminary basis late in 1982 and culminated in the submittal of the CRDR Program Plan in September 1983. Since the submittal of the Program Plan we have continued to develop the details for the CRDR tasks in accordance with Regulatory Requirements and Guidance, the BVPS-1 CRDR Program Plan, and the subsequent Staff comments to the Plan.

In the near future, Duquesne Light Company intends to provide the Staff with a pre-audit informational submittal focusing on the Staff comments on the Plan. This submittal will provide additional CRDR task details for the Staff and should prove helpful to the Staff in preparing for its audit of the BVPS-1 CRDR.

Review Phase

1. Historical Documentation Review - BVPS-1 Incident Report Reviews:
This task began on November 2, 1983 and the review has been completed. A Task report has been drafted and is anticipated to be available by the middle of May 1984.
2. Operating Personnel Survey - Questionnaire: This task formally began with the distribution of the questionnaire on March 21, 1983. The CRDR Review Team is completing its documentation on the review activities for this task at the present time. We anticipate that the task report will be available by the end of May 1984.

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Review Phase (continued)

3. Operating Personnel Survey - Interviews: Development of interview content was actually begun during the same time period as the incident review since some interview items were identified at that time. This task has continued to the present with incorporation of items identified during the review of questionnaire responses and the control room survey. Although the schedule has not been finalized, the interviews are anticipated to be performed by the Human Factors Specialist during May 1984. The task report is anticipated to be available by the end of June 1984.
4. Control Room Survey: This task began at the CRDR Team meeting on March 13, 1984. Initial review, evaluation and compilation of survey items is currently being completed. Preparation for the survey and final evaluation of survey items is anticipated to be completed by the end of May with performance of the survey starting approximately June 15, 1984. We anticipate the survey will take approximately three weeks and that the task report will be completed by mid-August.
5. Task Analysis: The CRDR task analysis is composed of four separate tasks. Each of the last three tasks is dependent on the performance and evaluation of its preceding task. The approximate schedules are as follows:
 - a. The task identification is to begin the second week of May and continue through to the end of July 1984.
 - b. The verification of control room instrumentation is targeted to begin the first week of August 1984, following completion of the task identification. This task is anticipated to take a maximum of two weeks to perform.
 - c. The Phase-1 validation task, Walk/Talk Throughs, is expected to begin mid-August 1984. This is the earliest possible start date and is anticipated to take three to four weeks to complete. This schedule is tentative pending final assessment of other activities expected to occur at about this time.
 - d. The Phase-2 validation performed on the BVPS-1 Simulator is scheduled for April 8 through 19, 1985.

Assessment and Implementation Phase

The final assessment phase is anticipated to begin in May 1985 soon after the review and evaluation of data gathered during the validation on the simulator. All HEDs identified during the CRDR will receive final review, evaluation, and categorization at that time. It should be noted that preliminary assessments of discrepancies may occur after or during any CRDR review phase; however, any preliminary assessments will be re-evaluated during the final assessment phase.

Assessment and Implementation Phase (continued)

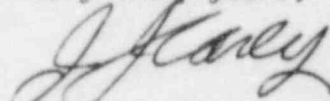
Implementation schedules for specific CRDR recommendations are dependent on HED significance determined during the assessment phase. Implementation schedules will be further addressed in the CRDR Summary Report. Duquesne Light Company also understands that, following the Staff SER on the CRDR Summary Report and resolution of any open issues, the implementation can begin according to an approved schedule that has been negotiated with the staff. Therefore, at this time, for significant HEDs, Duquesne Light believes that it is appropriate to confirm its intent to make all reasonable efforts to meet the CRDR Program Plan goals for resolving and implementing corrective actions. We note here that the HED categorization criteria as provided in the Program Plan will be revised according to staff comments to more fully reflect the criteria of potential error and potential consequences.

Documentation Phase

The final documentation phase will begin in May 1985 and is anticipated to initially proceed concurrently with the final assessment phase. The Summary Report is scheduled for submittal to the Staff in November 1985. The detailed documentation process, however, began simultaneously with the CRDR. In addition, we have planned to prepare a report for each review phase task and for the assessment phase. All task reports will be entered into the CRDR document file and those completed will be available for staff review during the audit. The reports provide a comprehensive summary of the methodology used, the review team procedures followed, and the findings of each review task. We also intend to include the appropriate information from these task reports in the CRDR Summary Report.

Should the staff desire additional information or have any questions regarding this submittal, please contact my office.

Very truly yours,



J. J. Carey
Vice President, Nuclear

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