Duquesne Light

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March 16, 1984

United States Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Mr. George W. Knighton, Chief
Licensing Branch 3
Office of Nuclear Reactor Regulations

SUBJECT: Beaver Valley Power Station - Unit No. 2
Docket No. 50-412
Responses to Procedures & Systems Review Branch Questions

Gentlemen:

The attachment to this letter provides responses to the Procedures and Systems Review Branch questions which were forwarded to Duquesne Light Company in your letter dated January 6, 1984. It is our intention to include these responses in FSAR Amendment 6.

DUQUESNE LIGHT COMPANY

By E. J. Woolever
E. J. Woolever
Vice President

GLB/wjs
Attachments

cc: Mr. H. R. Denton, Director NRR (w/attachments)
Mr. G. Walton, NRC Resident Inspector (w/attachments)
Ms. L. Lazo, Project Manager (w/attachments)
Mr. D. Eisenhut, Director Division of Licensing (w/attachments)

SUBSCRIBED AND SWORN TO BEFORE ME THIS
16th DAY OF March, 1984.

Anita Elaine Reiter
Notary Public

ANITA ELAINE REITER, NOTARY PUBLIC
ROBINSON TOWNSHIP, ALLEGHENY COUNTY
MY COMMISSION EXPIRES OCTOBER 20, 1986

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COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF ALLEGHENY)

On this 16th day of March, 1984, before me, a Notary Public in and for said Commonwealth and County, personally appeared E. J. Woolever, who being duly sworn, deposed and said that (1) he is Vice President of Duquesne Light, (2) he is duly authorized to execute and file the foregoing Submittal on behalf of said Company, and (3) the statements set forth in the Submittal are true and correct to the best of his knowledge.

Anita Elaine Reiter
Notary Public

ANITA ELAINE REITER, NOTARY PUBLIC
ROBINSON TOWNSHIP, ALLEGHENY COUNTY
MY COMMISSION EXPIRES OCTOBER 20, 1986

Question 630.16:

Provide the following information with respect to your Nuclear Division as shown in Figure 13.1-2:

a. A further breakdown and description of responsibilities of these units reporting to the Manager Nuclear Engineering.

b. The number of professional level persons currently assigned to each of functional units and the number projected at the time of startup of Beaver Valley Power Station Unit 2 (BVPS-2).

c. The approximate current and projected percentage of time spent by Nuclear Division units to support the Shippingport nuclear unit.

d. The physical location of the units within the Nuclear Division.

Response 630.16(a)

The Nuclear Engineering Department is a multi-discipline engineering organization currently broken into three functional sections; Nuclear Engineering Section, an Electrical Engineering Section and a General Engineering Section. The Nuclear Section provides the necessary design change safety evaluations, supports the department's compliance with regulations, codes and standards and are responsible for all design changes within the Nuclear Steam Supply System. The Electrical and General Sections provide the specific engineering discipline support required for design changes, studies or other applications. These three sections are supported by a drafting and design group.

630.16(b)

To be provided at a later date.

630.16(c)

Presently, the Shippingport Atomic Power Station is undergoing defueling operations. These defueling operations are expected to be completed late in 1984. At that time, the decommissioning contractor will take responsibility for the Shippingport project and Duquesne Light Company's involvement will essentially be nil. The table below lists the approximate current percentage of time spent by Nuclear Division units in support of the Shippingport Atomic Power Station.

	%
Nuclear Engineering	0
Nuclear Support Services	5
Personnel Administration	25
Nuclear Safety & Licensing	*
Nuclear Operations	8**

*During the decommissioning phase of the Shippingport Plant, it is expected that the NS&L Department will dedicate no more than one health physics professional and one or two technicians to monitor the activities of the DOE decommissioning contractor. The offsite environmental program will consider the effects of the Shippingport decommissioning but will not result in a significant increase in scope beyond that which is appropriate for monitoring the operation of the Beaver Valley units.

**This number represents the time spent by the Nuclear Operations Manager in support of the Shippingport Atomic Power Station.

630.16(d)

All nuclear division units shown on Figure 13.1-2 are currently located at the site complex except for the analytical services (fuel program) and Division training. The training organization will be situated on site in January 1985. The analytical services group is located near the construction division headquarters approximately 25 miles from the site.

Question 630.17

Provide the following information with respect to your plant staff as shown in Figure 13.1-5:

a. The number of individuals currently assigned to each of the functional blocks shown in Figure 13.1-5.

b. The number of individuals you plan to assign to each of the functional blocks shown in Figure 13.1-5 for the operation of BVPS Units 1 & 2.

c. A schedule for filling the unfilled positions needed at the time of operation of BVPS-2.

d. The number of individuals currently in training and planned to be trained and tested for RO and SRO positions for BVPS-2. Please note the current position of these individuals and if they hold a license on BVPS-1.

e. Resumes of individuals filling the following positions: Superintendent Maintenance, Station Maintenance Supervisor, I&C Supervisor, Chief Engineer, Refueling Supervisor, Station Engineering Supervisor, Supervisor Testing and Plant PErformance, Nuclear Shift Supervisors, and Nuclear Station Operating Foreman.

Response 630.17 (a) thru (e)

To be provided at a later date.

Question 630.18

Describe your planned membership for the Onsite Safety Committee

Response 630.18

As indicated in FSAR 13.4.1, the organization and administrative requirements of the Onsite Safety Committee will be identified in the BVPS-2 Technical Specifications. It is anticipated that the membership of the Onsite Safety Committee will be composed of the following:

Chairman	Chief Engineer
Member	Senior Licensed Operator
Member	Radiation Control Foreman
Member	Maintenance Engineer
Member	Sr. Eng. - Nuclear Eng. Dept.
Member	Sr. Testing or Study Proj. Coord.
Member	Shift Tech. Advisor
Member	Chemist
Member	Quality Control Engineer

Question 630.19

Describe the nature and content of the administrative procedures that control:

a. Procedures review and approval

b. Equipment control

c. Control of maintenance and modifications

d. Fire protection

e. Crane operation

f. Temporary changes to procedures

g. Temporary procedures

h. Special orders of a transient or self-cancelling character.

Response 630.19(a)

The administrative procedure that controls safety-related procedure review and approval contains sections that describe the format that all procedures shall follow, the personnel responsible for review and approval, the procedure review intervals, and the procedure revision process including on-the-spot revisions.

630.19(b)

The administrative procedure that deals with equipment control is the Clearance Procedure. The Clearance Procedure identifies the individuals responsible for releasing installed station equipment for maintenance, the personnel responsible for determining if an engineered safety feature component can be removed from service, the individuals responsible for determining and approving the switching and valving orders to preclude injury to personnel or damage to equipment, the tagging requirements for clearance points, and the method for returning equipment to service.

630.19(c)

The administrative procedure that controls maintenance and modifications provides sections that describe Corrective Action Maintenance and Design Change Installation (modifications). The procedure covering Corrective Action Maintenance provides instructions for intitation of a Maintenance Work Request (MWR), review and approval of MWRs, Non-Conformances/Deficiencies, and post maintenance testing and return to service.

The instructions for Design Change Installation describe initiation and control, Non-conformance/Deficiencies/Deviations, post maintenance testing and return to service, and documentation.

630.19(d)

The Fire Protection Administration Procedure describes the responsibilities of personnel for fire protection and prevention, the responsibilities of the Fire Brigade members, the procedure used to remove fire protection equipment from service, and establishes the minimum number of qualified Fire Brigade members to be on site at all times.

630.19(e)

The administrative procedure that deals with crane operation provides instructions on the personnel responsible for determining and approving safe load paths, the personnel responsible for implementing the heavy loads handling procedure, and the load testing requirements for lifting equipment. Also, the procedure describes the requirements for crane inspection and load holding capability testing prior to crane operation.

630.19(f)

The administrative procedure controlling temporary changes to procedures contains instructions on when a temprorary change may be made, the personnel responsible to initially approve the change, the time period the change may remain in effect without further approval, the personnel responsible for final approval, and the removal of the temporary change if disapproved.

630.19(g)

The administrative procedure that controls temporary procedures provides sections that describe the circumstances under which a temporary procedure may be issued, the format that a temporary procedure shall follow, the personnel responsible for review and approval, and the procedure revision process including on-the-spot revisions.

630.19(h)

The administrative procedure that deals with special operating orders identifies the personnel responsible for issuance and approval, the general instructions for use, and the documentation required.

Question 630.20

Describe the nature and content of the following items:

a. Standing orders to shift personnel inlcuding the authority and responsibility of the shift supervisor, senior operator in the control room, control room operator, and the shift technical advisor.

b. Assignment of shift personnel to duty stations.

c. Shift relief and turnover procedures.

d. Control room access procedures.

e. Limitations on working hours.

f. Feedback of operating experience program.

g. Shift supervisor adminstrative duties.

h. Verification of correct performance of operating activities.

Response 630.20(a)

Standing orders to shift personnel are contained in Station Administrative Procedures and incude the conduct required of shift personnel, the use of radios, the use of literature, the personnel authorized to acknowledge annunciators, and communication procedures. The responsibilities and authority of shift personnel are listed below:

Nuclear Shift Supervisor (NSS) - The NSS is responsible to the Nuclear Station Operating Supervisor on a shift basis for the safe and efficient operation of the station. In the absence of higher direct-line supervision, the NSS is in complete charge and is responsible for the safe operation of the entire station, the radiological safety of personnel, and the security of the station.

Nuclear Station Operating Foreman (NSOF) - The NSOF directs the operating forces in accordance with testing, maintenance, and operational requirements. He ensures that all operations are conducted safely in accordance with approved instructions, and that operating records are maintained and reviewed to assure equipment is operated properly and safely. The NSOF assumes the control room command function when the NSS is temporarily absent from the control room.

Nuclear Control Operator (NCO) - The NCO is responsible to maintain plant operation within the requirements of the Technical Specifications. He is responsible for initiating a manual reactor trip when in his judgement a situation exists which jeopardizes public or plant safety immediately upon determining and verifying that a safety-related operating parameter exceeds safety system setting and an automatic reactor trip should have occurred. Also, he reviews routine operating data to assure safe operation.

Shift Technical Advisor (STA) - The STA is responsible for advising the Nuclear Shift Supervisor in the assessment of transient and accident situations including those unusual situations resulting from multiple equipment failures and operator errors and appropriate operation actions.

630.20(b)

Assignment of shift personnel to duty stations is performed by the NSS/NSOF based on current plant needs and anticipated plant evolutions.

630.20(c)

The shift turnover procedure includes responsibilities of off-going personnel not to relinquish assigned duties until properly relieved. The procedure also includes the responsibilities of on-coming personnel to review the plant status, conduct a briefing with the person being relieved using the Shift Relief Turnover Checklist, review log entries, and sign the log sheet indicating a proper briefing and understanding of assigned tasks.

630.20(d)

Access to the control room is controlled by a magnetic card reader at the entrance door. Access is limited to those personnel having the proper security clearance and job duties that require entrance to the control room.

630.20(e)

The restrictions applied to working hours of personnel identify the maximum amount of time a person should work straight and the minimum amount of off time that should be given between work periods. Also the restrictions include the maximum amount of time personnel should work in any 24 hour period, 48 hour period, or 7 day period.

630.20(f)

The Operating Experience Feedback Selection procedure describes the general purpose of the program, the personnel responsible to select feedback material, the distribution of material, and the personnel responsible to resolve conflicting or contradictory material.

630.20(g)

The administrative duties of the Nuclear Shift Supervisor (NSS) include his being continuously aware of the status of all systems and equipment and of all intended operations which may in any way affect the reactor or result in any release of radioactivity. Examples of his administrative duties are giving authorization to remove equipment from service for maintenance, to use bypasses and blocks, to use jumpers or to lift leads.

630.20(h)

The Station Surveillance Program is utilized to verify the correct performance of operating activities. The Station Surveillance Program consists of one member of the plant group performing a work activity observing, evaluating and documenting the performance of that work activity. Surveillances are performed at the frequency set by the Surveillance Coordinator.

Question 630.21

State whether or not those members of the Operations Startup Group shown in Figure 14.2-2 and titled Nuclear Station Superintendent, Nuclear Station Operations Supervisor, Senior Mechanical Engineer, I&C Supervisor, Administrative Supervisor, and Supervisor of Testing and Plant Performance are the same individuals shown in Figure 13.1-5 that have responsibilities for BVPS-1.

Response 630.21

The members of the Operations Startup Group (OSUG) shown in Figure 14.2-2 are not the same individuals shown in Figure 13.1-5 presently having responsibilities for BVPS-1. As the OSUG responsibilities decrease, personnel will be transferred to the combined operating plant staff shown in Figure 13.1-5.

Question 630.22

In respect of your Initial Test Program, Section 14.2, provide the following:

a. The means used to assure that prerequisites are satisfied for individual tests.

b. The procedures to be followed to assure that plant modifications, or repairs that result from test program analysis are performed.

c. The procedure used to ensure that necessary retesting is performed following repairs or modifications.

d. The controls that will be in effect to require adherence to approved test procedures.

Response 630.22(a)

The Operations Startup Group Administrative Procedures require that personnel performing a test procedure during the Initial Test Program verify that the prerequisites identified in the test procedure have been satisfied. This verification is documented on sign off lines adjacent to each individual prerequisite.

630.22(b)

The Operations Startup Group Administrative Procedures require that deficiencies noted during the performance of a test are documented on the individual test procedure and also on a Test Deficiency Record. This Test Deficiency Record contains a listing of any resulting Start Work Requests (SWRs) generated to obtain the necessary corrective action. SWRs are tracked as open items by the Planning & Scheduling computerized tracking system. In addition, test personnel are cognizant of the scheduling and actual implementation of any retest requirements resulting from the test deficiencies. The need for retesting is also recorded by test personnel on the actual SWR. Test deficiencies and associated SWRs must be dispositioned and Open Items relating to a system's test status cleared prior to final system acceptance by DLC.

630.22(c)

As noted above, the Operations Startup Group Administrative procedures require the documentation of retest requirements on the individual Startup Work Requests used to obtain corrective action. In addition, a separate Retest Requirements Form is used to inform startup personnel of the retesting required, and to aid in retest scheduling. The SWR provides the administrative control to assure the disposition of each deficiency. The retest requirement report remains as an open item until the required retest is satisfactorily completed and thus prevents the acceptance of a system which has not been retested.

630.22(d)

The Operations Startup Group Administrative Procedures require that personnel use and adhere to approved test procedures. These administrative procedures also contain the necessary document control requirements to provide assurance that only the latest revision of the approved test procedure will be used for actual test performance. The Operations Quality Assurance Program provides periodic audits which will verify the satisfactory implementation of these requirements. Operations Quality Control personnel may provide surveillance during the Initial Test Program to assure procedure compliance as required by the Director Operations Quality Control.