



# Duquesne Light

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June 28, 1984

Director of Nuclear Reactor Regulation  
United States Nuclear Regulatory Commission  
Attn: Mr. D. 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  
Generic Letter 82-33; Procedures Generation  
Package for Emergency Operating Procedures

Gentlemen:

In accordance with our submittals referenced in Attachment 1, we are providing a Procedures Generation Package (PGP) which describes the methods for developing and implementing function-oriented Emergency Operating Procedures (EOPs). These upgraded EOPs are based on the re-analysis of transients and accidents as described and clarified in item I.C.1 of NUREG-0737 and the Westinghouse generic Emergency Response Guidelines (ERGs), Rev. 1, with their background documents. The Duquesne Light Company has participated with the Westinghouse Owners Group during the re-analysis of transients and accidents and the development of the generic ERGs and background documents. It is our intent to follow these generic guidelines as closely as possible in order to take full credit for the analysis effort, the human factors principles applied and the function and task analysis effort which has formed the basis for the operator information and control needs.

At present the upgraded EOP development status and schedule is as follows. The upgraded EOPs have been drafted and have received table-top validation. Program descriptions are provided in detail in this submittal. The first iteration of EOP verification is also being conducted on those procedures which have received table-top validation. When all upgraded procedures have been through these two processes, the Control Room Design Review (CRDR) Team will complete a task analysis of these initial drafts to determine the characteristics of needed instrumentation and controls. A walk/talk-through validation will follow this task analysis effort. Following the upcoming fourth refueling outage, the plant specific simulator will be operational and validation of the EOPs on the simulator will take place. This effort will be managed by the CRDR Team. It is with this coordination of tasks that we expect to integrate the development of upgraded EOPs with the Detailed CRDR. It is expected that an iterative process will follow where necessary which will resolve EOP discrepancies identified during the verification and validation phases. The training program development and operator training effort will follow. Implementation of the upgraded EOPs will occur during the fifth refueling outage tentatively scheduled for July of 1986.

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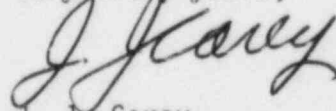
Through this stage of EOP development, there has not been any deviations from the ERGs identified as having safety significance. If any are identified, they will be submitted under separate cover in accordance with the PGP. All deviations from the ERGs are documented and are available for NRC review at the site. Clarification of what constitutes a deviation having safety significance from one which does not was obtained from the NRC. Our understanding of this classification is documented in Attachment 1, Item 3 and has served as our basis for evaluating deviations.

Included with this submittal is Attachment 2, Procedures Generation Package for Beaver Valley Unit 1, which describes the methods utilized in preparing upgraded EOPs from the generic ERGs. Section 3 of Attachment 2 has been drafted for incorporation into the Station Operating Manual and will provide the administrative controls necessary for maintaining the EOPs after implementation. This section will receive additional reviews by the Onsite Safety Committee and is therefore subject to minor revisions following this submittal. However, the intent of Section 3 will not change and is therefore included in this submittal for your review.

This PGP is being submitted for your review with sufficient time to permit resolution of any NRC concerns in a timely fashion so as to not adversely impact operator training. It is our desire to work closely with the NRC to accomplish successful implementation of the EOPs in accordance with the identified schedule.

If you have any questions, please contact me or members of my staff.

Very truly yours,



J. J. Carey  
Vice President, Nuclear

#### Attachments

cc: Mr. 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, DC 20555

Mr. Peter Tam, Project Manager  
U. S. Nuclear Regulatory Commission  
Phillips Building  
Washington, DC 20555  
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ATTACHMENT 1

Correspondence to the NRC Regarding EOP Development

1. April 15, 1983; Carey to Eisenhut, response to Generic Letter 82-33 Supplement 1 to NUREG-0737.
2. July 25, 1983; Carey to Eisenhut, clarification for the scheduled completion of the tasks identified in Supplement 1 to NUREG-0737.
3. March 14, 1984; Carey to Varga, documentation of a conference call to obtain clarification on the identification of significant deviations from generic technical guidelines.
4. May 30, 1984; Carey to Eisenhut, request to revise schedule for submittal of PGP.
5. September 27, 1983; Carey to Eisenhut, submittal of Detailed Control Room Design Review
6. April 30, 1984; Carey to Eisenhut, schedule for starting various phases of the CRDR