

# Duquesne Light Company

Beaver Valley Power Station  
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(412) 393-5255

JOHN D. SIEBER  
Vice President - Nuclear Group

September 22, 1992

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

Subject: Beaver Valley Power Station, Unit No. 1  
Docket No. 50-334, License No. DPR-66  
Response to Supplement 1 to Generic Letter 87-02  
on SQUG Resolution of USI A-46. (TAC #69428)

## I. INTRODUCTION

On February 19, 1987, the NRC issued Generic Letter 87-02, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46." This Generic Letter encouraged utilities to participate in a generic program to resolve the seismic verification issues associated with USI A-46. As a result, the Seismic Qualification Utility Group ("SQUG") developed the "Generic Implementation Procedure (GIP) for Seismic Verification of Nuclear Plant Equipment." On May 22, 1992, the NRC Staff issued Generic Letter 87-02, Supplement 1, which constituted the NRC Staff's review of the GIP and which included Supplemental Safety Evaluation Report Number 2 ("SSER-2") on the GIP, Revision 2, corrected on February 14, 1992. The letter to SQUG enclosing SSER-2 requests that SQUG member utilities provide to the NRC, within 120 days, a schedule for implementing the GIP. By letter dated August 21, 1992, to James G. Partlow, NRR-NRC, SQUG clarified that the 120 days would expire on September 21, 1992. This letter responds to the staff's request.

## II. COMMITMENT TO GIP

As a member of SQUG, Duquesne Light Company (DLC) commits to use the SQUG methodology as documented in the GIP, where "GIP" refers to GIP Revision 2, corrected February 14, 1992, to resolve USI A-46 at Beaver Valley Power Station Unit No. 1 (BVPS-1). The GIP, as evaluated by the Staff, permits licensees to deviate from the SQUG commitments embodied in the Commitment sections, provided the Staff is notified of substantial deviations prior to implementation. DLC recognizes that the Staff's position in SSER-2 "is that if licensees use other methods that deviate from the criteria and procedures as described in SQUG commitments and in the implementation guidance of the GIP, Rev. 2, without prior NRC staff approval, the method may not be acceptable to the staff and, therefore, may result in a deviation from the provisions of Generic Letter 87-02...."

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Specifically, DLC commits to the SQUG commitments set forth in the GIP in their entirety, including the clarifications, interpretations, and exceptions identified in SSER-2 as clarified by the August 21, 1992, SQUG letter responding to SSER-2.

DLC generally will be guided by the remaining (non-commitment) sections of the GIP, i.e., GIP implementation guidance, which comprises suggested methods for implementing the applicable commitment. DLC will notify the NRC as soon as practicable, but no later than the final USI A-46 summary report, of significant or programmatic deviations from the guidance portions of the GIP, if any. Justifications for such deviations, as well as for other minor deviations, will be retained on site.

### III. IN-STRUCTURE RESPONSE SPECTRA

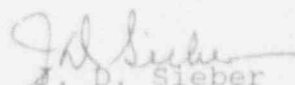
For defining seismic demand, DLC will use the options provided in the GIP for median-centered and conservative design in-structure response spectra, as appropriate, depending on the building, the location of equipment in the building, and equipment characteristics.

### IV. SCHEDULE

Given the magnitude of the effort required to achieve resolution of USI A-46, final implementation must be carefully integrated with outage schedules and the seismic IPEEE response. Considering the workload set forth by the criteria of the GIP, a Seismic Evaluation Report summarizing the result of the A-46 program at BVPS-1 will be submitted to the NRC by May 21, 1995. However, the A-46 program completion schedule may be affected by coordination with the seismic IPEEE response, the scope and schedule for completing the necessary SQUG training and by the availability of industry resources which may be limited because of the large number of licensees implementing this program.

Should you have any questions regarding this submittal, please contact Ed Coholich at (412) 393-5222.

Sincerely,

  
J. D. Sieber

cc: Mr. L. W. Rossbach, Sr. Resident Inspector  
Mr. T. T. Martin, NRC Region I Administrator  
Mr. A. W. De Agazio, Project Manager  
Mr. M. L. Bowling (VEPCO)

COMMONWEALTH OF PENNSYLVANIA) )  
COUNTY OF BEAVER ) ) SS:

On this 22nd day of September, 1992,  
before me, Sheila M. Fattore, a Notary Public in and for said  
Commonwealth and County, personally appeared J. D. Sieber, who being  
duly sworn, deposed, and said that (1) he is Vice President - Nuclear  
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, information and belief.

Sheila M. Fattore

