



UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

REGARDING PROPOSED REVISIONS TO THE

QUALITY ASSURANCE PROGRAM DESCRIPTION

PENNSYLVANIA POWER COMPANY

OHIO EDISON COMPANY

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

THE TOLEDO EDISON COMPANY

FIRSTENERGY NUCLEAR OPERATING COMPANY

BEAVER VALLEY POWER STATION, UNIT NOS. 1 AND 2

DOCKET NOS. 50-334 AND 50-412

1.0 INTRODUCTION

By letter dated March 6, 1999 (L-99-015), as supplemented by letters dated June 25, 1999 (L-99-093), and November 19, 1999 (L-99-174), the Duquesne Light Company (DLC) submitted a request for approval of a proposed change in the Beaver Valley Power Station, Unit Nos. 1 and 2 (BVPS-1 and BVPS-2) Quality Assurance (QA) Program Description in Chapter 17.2 of the BVPS-2 Updated Final Safety Analysis Report (UFSAR). The BVPS-1 and BVPS-2 QA Program Description is applicable to both units and is contained in the BVPS-2 UFSAR. Specifically, the proposed change would limit the required Onsite Safety Committee (OSC) reviews of procedures to those requiring a safety evaluation in accordance with 10 CFR Part 50, Section 59 (10 CFR 50.59). Implicit to this change would be the substitution of procedure reviews by independent qualified reviewers (IQRs) and approval by responsible discipline managers, or their designees, in place of the OSC review when a completed 10 CFR 50.59 safety evaluation is not required.

On the dates of the March 6, June 25, and November 19, 1999, letters, DLC was the licensed operator for BVPS-1 and BVPS-2. On December 3, 1999, DLC's ownership interests in both BVPS-1 and BVPS-2 were transferred to the Pennsylvania Power Company, and DLC's operating authority for BVPS-1 and BVPS-2 was transferred to FirstEnergy Nuclear Operating Company (FENOC). By letter dated December 13, 1999, FENOC requested that the Nuclear Regulatory Commission (NRC) continue to review and act upon all requests before the Commission which had been submitted by DLC.

## 2.0 EVALUATION

The proposed change involves reductions in the procedure review responsibilities of the OSC as described in the Operations QA Program Description, Section 17.2.1.3:

- The OSC will not review the Security Plan and implementing procedures.
- The OSC will not review the Emergency Plan and implementing procedures.
- The OSC will review only those procedure or procedure changes requiring a complete 10 CFR 50.59 safety evaluation including temporary changes in lieu of reviewing all procedures required by Technical Specification 6.8.

The proposed change would add the following requirements for IQRs in the Operations QA Program Description, Section 17.2.5:

- The IQR will review each procedure or revision including temporary changes required by Technical Specification 6.8.1.
- The responsible IQR will ensure each procedure or revision includes a determination of whether the procedure or revision requires a 10 CFR 50.59 safety evaluation.
- The IQR will review temporary changes to procedures within 14 days of implementation.
- The IQR is independent and not involved in the activity being reviewed.
- The IQR meets the qualifications of the American National Standards Institute (ANSI) N18.1-1971, Section 4.2.4 for Technical Manager.
- The IQR must be knowledgeable in the functional areas reviewed. The IQR ensures that the cross-discipline reviews are performed when necessary.
- The IQR is qualified to perform 10 CFR 50.59 safety evaluations under a training program that meets ANSI N18.1-1971, Section 5.3.

The removal of review by the OSC for the Emergency and Security Plan is acceptable and consistent with NRC Generic Letter 93-07, "Modification of Technical Specification Administrative Control Requirements for Emergency and Security Plans."

The IQR program is designed to replace the OSC reviews of procedures that do not require a completed 10 CFR 50.59 safety evaluation. This is an acceptable method as long as the IQR program has the necessary controls to screen procedure changes including temporary changes. Also, the qualified reviewer must ensure that cross-disciplinary reviews are performed when necessary. The concept of an IQR program is consistent with ANSI N18.7, "Administrative Controls and Quality Assurance of the Operational Phase of Nuclear Power Plants," Section 5.2.15, "Review, Approval, and Control of Procedures."

### 3.0 CONCLUSION

The controls proposed and described in Section 2.0 above are acceptable attributes of an IQR program. Specifically, ANSI N18.1-1971 is endorsed by Regulatory Guide 1.8, Revision 1, as an acceptable method of determining the qualifications of reviewers. Section 4.2.4, "Technical Managers" of ANSI N18.1 addresses qualifications suitable for reviewers. Also, Section 5.3 of ANSI N18.1 is an acceptable training program method for reviewers. The independence, training, experience, and cross-discipline review requirements provide adequate assurance that the safety significance of procedure changes is assessed as part of the IQR screening process. Therefore, the IQR process provides an acceptable alternative to review by the OSC for procedure changes that do not require a completed 10 CFR 50.59 safety evaluation. BVPS-1 and BVPS-2 continue to satisfy the NRC's Standard Review Plan (NUREG-0800), Part 17.2, II Acceptance Criteria, Section 6, and 10 CFR Part 50, Appendix B, Criterion VI, "Document Control."

Principal Contributor: M. Bugg

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