

Duquesne Light Company

Beaver Valley Power Station
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GEORGE S. THOMAS
Division Vice President
Nuclear Services
Nuclear Power Division

April 14, 1993

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

Subject: Beaver Valley Power Station, Unit No. 2
BV-2 Docket No. 50-412, License No. NPF-73
Proposed Operating License Change Request No. 75
(TAC No. M86126)

Pursuant to 10 CFR 50.90, Duquesne Light Company requests an amendment to the above license in the form of changes to the technical specifications. The proposed change will revise Table 4.3-1 titled, "Reactor Trip System Instrumentation Surveillance Requirements," Table Notation (10). The specific revision to Table Notation (10) would be to add a footnote which states the following: "Complete verification of OPERABILITY of the manual reactor trip switch circuitry shall be performed prior to startup from the first shutdown to MODE 3 occurring after April 6, 1993."

On April 6, 1993, we submitted a request for Nuclear Regulatory Commission (NRC) discretionary enforcement regarding the requirements of Technical Specification Surveillance Requirement 4.3.1.1.1. This request was necessary since the Manual Reactor Trip function had only been partially tested during the 18 month surveillance testing program for the reactor trip breakers and reactor trip bypass breakers. In particular, the surveillance test for the Manual Reactor Trip function tested the undervoltage coil and the shunt trip coil simultaneously instead of independently from the Main Control Board manual reactor trip switches.

On April 6, 1993, the NRC granted Duquesne Light Company's request for discretionary enforcement for a surveillance test of the manual reactor trip function at Beaver Valley Unit No. 2.

The proposed technical specification changes are presented in Attachment A. The safety analysis (including the no significant hazards evaluation) is presented in Attachment B. The typed replacement technical specification page is presented in Attachment C. Our request for discretionary enforcement is presented in Attachment D and the NRC's Notice of Enforcement Discretion is presented in Attachment E.

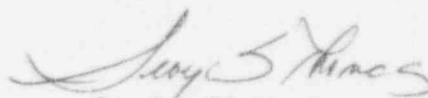
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This change has been reviewed by the Onsite Safety Committee and Offsite Review Committee. The change was determined to be safe and does not involve a significant hazard consideration as defined in 10 CFR 50.92 based on the attached safety analysis.

We request that this proposed change be handled as an exigent technical specification change in accordance with 10 CFR 50.91(a)(6). The exigent process is necessary as a condition of the NRC policy statement published in the Federal Register (58 FR 14308) on March 17, 1993, addressing the exercise of discretion for an operating facility (10 CFR 2, Appendix C). This amendment request fulfills the commitment made in our April 6, 1993 request for discretionary enforcement.

Sincerely,


G. S. Thomas

cc: Mr. L. W. Rossbach, Sr. Resident Inspector
Mr. T. T. Martin, NRC Region I Administrator
Mr. G. E. Edison, Project Manager
Mr. W. P. Dornsife, Director BRP/DER
Mr. R. J. Barkanic, BRP/DER
Mr. M. L. Bowling (VEPCO)

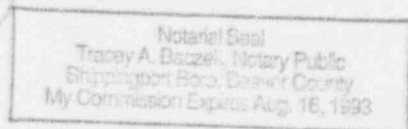
COMMONWEALTH OF PENNSYLVANIA)) SS:
COUNTY OF BEAVER))

Before me, the undersigned notary public, in and for the County and Commonwealth aforesaid, this day personally appeared George S. Thomas, to me known, who being duly sworn according to law, deposes and says that he is Division Vice President, Nuclear Services of the Nuclear Power Division, Duquesne Light Company, he is duly authorized to execute and file the foregoing submittal on behalf of said Company, and the statements set forth in the submittal are true and correct to the best of his knowledge, information and belief.

George S. Thomas
George S. Thomas

Subscribed and sworn to before me
on this 4th day of April, 1993

Tracy A. Caspek
Notary Public



Member, Pennsylvania Association of Notaries