



Nuclear Group
P.O. Box 4
Shippingport, PA 15077-0004

Telephone (412) 393-6000

August 17, 1994

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. 87

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 changes will revise Surveillance Requirement (SR) 4.6.2.2.d of Limiting Condition For Operation (LCO) 3.6.2.2, titled "Containment Recirculation Spray System," by adding a new footnote number (1) pertaining to 2RSS*P21A pump performance requirements. In addition, SR 4.6.2.2.e.2 would be revised by deleting the footnote, denoted by a single asterisk, which pertains to an extension to the 18 month surveillance interval for the first fuel cycle.

On August 15, 1994, a request for Nuclear Regulatory Commission (NRC) enforcement discretion was submitted regarding the requirements of Limiting Condition For Operation (LCO) 3.6.2.2 action statement "a." Enforcement discretion was requested for the time period necessary to process and receive NRC approval for a change to the technical specifications reflecting the revised flow requirements associated with 2RSS*P21A recirculation spray pump. The NRC verbally granted Duquesne Light Company's request for enforcement discretion on the same day.

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. The request for enforcement discretion is presented in Attachment D.

It is requested that this proposed change be processed as an emergency license amendment in accordance with 10 CFR 50.91(a)(5). The recirculation pump has been shown to not meet the existing surveillance requirements and was declared inoperable in accordance

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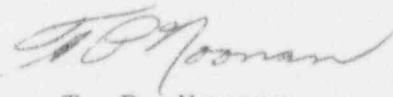
with the technical specifications. The action statement requires restoring the pump to operable status within 72 hours or be in Hot Standby within the next 6 hours and ultimately the plant would be required to enter Cold Shutdown.

Details relating to the conditions leading to this situation are contained in Attachment D. A review of records relating to the recirculation spray pumps resulted in the conclusion that a calibration mismatch existed between a flow element and flow transmitter. When the pump test data was corrected to reflect this mismatch, it was determined that the 2RSS*P21A pump could not be demonstrated to meet the current technical specifications and retesting could not be completed without entering Cold Shutdown conditions. The approval of the request for enforcement discretion has permitted the plant to continue to operate for the period of time necessary for the NRC to approve an emergency license amendment.

This submittal fulfills our commitment made during the August 15, 1994, 3:00 P.M. conference call when approval for enforcement discretion was verbally granted. The commitment was to submit an emergency license amendment request by August 17, 1994.

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.

Sincerely,



T. P. Noonan
Division Vice President
Nuclear Operations

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

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 Thomas P. Noonan, to me known, who being duly sworn according to law, deposes and says that he is Division Vice President, Nuclear Operations 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.

Thomas P. Noonan
Thomas P. Noonan

Subscribed and sworn to before me
on this 17th day of August, 1994.

Phyllis M. Fattore
Notary Public

