

Duquesne Light Company

Beaver Valley Power Station
PO Box 4
Shippingport, PA 15077-0004

July 25, 1991

JOHN D. SHERR
Vice President - Nuclear Group

00121393-1215

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

Subject: Beaver Valley Power Station, Unit No. 1 and No. 2
BV-1 Docket No. 50-334, License No. DPR-66
BV-2 Docket No. 50-412, License No. NPF-73
NRC Generic Letter No. 88-14 (TAC No. 71624 and 71629)

- Ref: 1) Duquesne Light Company letter to the NRC dated
February 17, 1989
- 2) Duquesne Light Company letter to the NRC dated
May 3, 1989
- 3) Duquesne Light Company letter to the NRC dated
February 14, 1990

The purpose of this letter is to inform you that these modifications which we had committed to implement on the Beaver Valley Unit No. 1 Control Room HVAC Instrument Air System and the Intake Structure Instrument Air System by the end of the eighth refueling outage have been completed. This letter will also confirm that we did complete, as scheduled, the modifications to the Beaver Valley Unit No. 2 Instrument Air System that were planned to be made by the end of the Unit No. 2 second refueling outage. Additionally, we want to inform you of changes that will be made in the frequency for performance of tests to monitor air quality on certain instrument air systems (IAS).

On August 8, 1988, NRC Generic Letter No. 88-14, "Instrument Air System Problems Affecting Safety-Related Equipment", was issued to all holders of Operating Licenses or Construction Permits for Nuclear Power Reactors. By letter dated February 17, 1989, Duquesne Light Company provided a response indicating the actions that had been completed and a schedule for the completion of the remaining activities. By letters dated May 3, 1989 and February 14, 1990, Duquesne Light Company provided additional information and an update of the status of actions taken at Beaver Valley Unit No. 1 and Unit No. 2 to meet the requirements of NRC Generic Letter No. 88-14.

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Our plans at the time of the last status update was to modify the piping arrangement of the Unit No. 1 Control Room Ventilation System IAS so that all of the components served by the system would receive filtered air. This modification has been accomplished.

We have also installed an oil free air compressor, a dryer and an afterfilter in the Intake Structure IAS. These changes should bring about a noticeable improvement in the air quality of that system.

Implementation of the Intake Structure IAS and the Control Room Ventilation System IAS modifications completes those Unit No. 1 design changes that have been committed to in response to Generic Letter No. 88-14 except for the modifications to the Unit No. 1 Containment IAS which are scheduled for the ninth refueling outage.

During the Unit No. 1 eighth refueling outage we also made some changes to the Unit No. 1 Compressed Air System. An engineering study of the Unit No. 1 Compressed Air System and air quality tests on the Station IAS lead to the decision to replace the three existing air compressors in the Compressed Air System with two new, larger capacity, oil free compressors. These air compressors supply compressed air to the Station IAS and components outside the containment except for the Intake Structure and the Control Room HVAC System. A redundant air dryer, air filter, a dew point monitoring cell and some flow measuring devices were also added to the Station Instrument Air System. We expect these changes to enable the Unit No. 1 Station IAS to consistently meet ISA S7.3 air quality requirements.

Testing to monitor air quality of the Beaver Valley Unit No. 1 and Unit No. 2 Station IAS, the Unit No. 1 Control Room HVAC IAS, the Unit No. 2 Containment IAS and the Intake Structure IAS has been conducted on a periodic basis. This monitoring program has been in effect since it was implemented as discussed in our initial response to Generic Letter 88-14. Based on the information obtained from this monitoring program and the design changes that have been implemented or planned for certain instrument air systems, a reduction in the performance frequency for some testing is planned.

The frequency of testing for flammable gas in all systems that are routinely tested will be changed from weekly to quarterly. This includes the Unit No. 1 Station IAS, the Unit No. 1 Control Room HVAC IAS, the Intake Structure IAS, the Unit No. 2 Station IAS and the Unit No. 2 Containment IAS. No flammable gases have been detected to date during the monitoring program for these systems. Continued expenditure of manpower to run the flammable gas checks more frequently than once per quarter is not considered warranted.

The frequency of testing the Unit No. 2 Station IAS will be changed from weekly to quarterly for the oil test and from weekly to monthly for the dew point and particulates. The system uses oil free compressors and oil has not been detected during the weekly tests. Since Generic Letter No. 88-14 was initially issued, several changes have been made to the Unit No. 2 Station IAS to improve the air dew point and particulate quality. A larger capacity air dryer has been permanently installed in the system to improve the air dew point. A dew point meter was installed at the outlet of the air dryer which continuously displays the dryer outlet dew point locally and provides a local and control room alarm should the dew point rise to an unacceptable value. A 0.1 micron coalescent filter has been installed downstream of all carbon steel components to remove particulates. Completion of these modifications satisfies the commitments we made in Reference 3 regarding changes to this system. Testing of the system for dew point and particulates subsequent to these changes has demonstrated the air quality meets requirements when the components are in service and functioning properly.

Two months after the implementation of the previously discussed design change which installed larger oil free compressors, an air filter downstream of the carbon steel components and a dew point monitoring cell at the outlet of the air dryers with local readout and local and control room alarms, the frequency of testing the Unit No. 1 Station IAS will be changed from weekly to quarterly for the oil test and monthly for the dew point and particulates tests. Weekly testing will be performed for approximately two months after implementation of the changes to confirm acceptable air quality after which time the testing frequency will be reduced.

The frequency of testing the Intake Structure IAS for oil will be reduced from weekly to quarterly approximately two months after the oil free compressor has been installed in the system. The frequency of testing the system for dew point and particulates will be reduced from weekly to monthly at the same time.

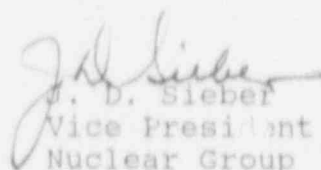
The frequency of testing the Unit No. 2 Containment IAS for oil will be reduced from weekly to quarterly. This system utilizes oil free air compressors and the air quality testing performed to date has not detected any oil in the system. No change in the frequency of testing this system for dew point and particulates is planned at this time.

The frequency of testing the Control Room HVAC IAS for particulates will be reduced from weekly to monthly approximately two months after system modifications. The frequency of testing for oil and dewpoint will not be changed at this time. If additional changes are made to the system or the results of continued testing of air quality provides a basis for further changes, action may be taken at that time to again change test frequencies.

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If you have any questions regarding the planned changes in the testing frequency for the various air systems please contact Drexel Williams at (412) 393-5226.

Sincerely,


J. D. Sieber
Vice President
Nuclear Group

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

COMMONWEALTH OF PENNSYLVANIA)

) SS:

COUNTY OF BEAVER)

On this 23rd day of July, 1991,
before me, Tracey A. Baczek, 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.

Tracey A. Baczek

Notarial Seal
Tracey A. Baczek, Notary Public
Shippingport Corp. Beaver County
My Commission Expires Aug. 16, 1993

Member, Pennsylvania Association of Notaries