

# Duquesne Light Company

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February 7, 1995

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555-0001

**Subject: Beaver Valley Power Station, Unit No. 2**  
**Docket No. 50-412, License No. NPF-73**  
**IST Program Update: ASME/ANSI OMa-1988 Part 10**

The purpose of this letter is to request approval to update the Inservice Test (IST) Program to the requirements of ASME/ANSI Standard OMa-1988 Part 10 for leak-rate testing for groups of valves. The applicable ASME Boiler and Pressure Vessel Code, Section XI, for Unit No. 2 is the 1983 Edition through Summer 1983 Addenda. The requirements for leak-rate testing for groups of valves are contained in paragraph 4.2.2.3 of OMa-1988 Part 10.

The Code of Federal Regulations (CFR), 10 CFR 50.55a(f)(4)(iv), provides for the inservice testing of pumps and valves to meet requirements set forth in subsequent editions and addenda of the ASME Code that are incorporated by reference in paragraph (b) of 10 CFR 50.55a. Reference to the 1989 Edition of ASME Section XI is included in 10 CFR 50.55a(b)(2). This edition of the ASME Code indicates that the rules for inservice testing of valves are as specified in the ASME/ANSI Standard OMa-1988 Part 10. Paragraph 4.2.2.3 of this standard has also been endorsed in the draft NUREG 1482, "Guidelines for Inservice Testing at Nuclear Power Plants."

Approval to use paragraph 4.2.2.3 will permit the leak-rate testing of two motor operated valves arranged in a parallel configuration during the Unit No. 2 refueling outage scheduled to begin March 24, 1995. It is, therefore, requested that the NRC grant approval to update the Unit No. 2 IST Program to the requirements of ASME/ANSI Standard OMa-1988 Part 10 for leak-rate testing for groups of valves by March 7, 1995, in order to incorporate these changes into the IST Program and implementing procedures in time to support the outage.

Separate discussions of this request were previously conducted on December 16, 1994, with the NRC staff. It was believed that the impending approval to use NUREG 1482 through a staff issued generic letter would have precluded the need for this request. However, since the NUREG has not been issued, the agreed upon plan was to submit a request for an IST Program change by mid-February.


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If you have any questions regarding this request, please contact  
Mr. G. S. Sovick at (412) 393-5211.

Sincerely,

  
George S. Thomas

cc: Mr. L. W. Rossbach, Sr. Resident Inspector  
Mr. T. T. Martin, NRC Region I Administrator  
Mr. G. E. Edison, Sr. Project Manager