



Duquesne Light

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May 8, 1984

United States Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Mr. Thomas H. Novak
Assistant Director for Licensing
Office of Nuclear Reactor Regulation

SUBJECT: Beaver Valley Power Station - Unit No. 2
Docket No. 50-412
Significant Licensing Issues

Gentlemen:

In early March 1983, I was informed of your desire to meet with Duquesne Light Company (DLC) upper management to discuss the licensing status of Beaver Valley Power Station Unit 2 (BVPS-2). The meeting was tentatively scheduled for March 21, 1984, here in our project offices in Pittsburgh. At the request of George W. Knighton, in preparation for this meeting, a list of significant licensing issues on BVPS-2 was provided to our NRC Project Manager. Shortly thereafter, we were informed that the meeting had to be postponed.

The attached list of Significant Licensing Issues is provided for your review. We feel that these items have the potential for significant impact on the BVPS-2 licensing schedule and that a significant portion of the responsibility for resolving the issues falls upon the NRC. Many of these issues will require your evaluation as described in Generic Letter 84-08. The impact of these issues upon issuance of the SER and the schedule for ACRS must be discussed.

We request that the meeting be rescheduled with DLC management for the earliest possible date. We suggest that the attached list of licensing issues serve as the agenda for discussion at the meeting. A discussion of the schedule for providing remaining draft SER sections as requested in our March 30, 1984, letter to G. W. Knighton is also appropriate. DLC will provide whatever cooperation is necessary to accommodate your schedule.

DUQUESNE LIGHT COMPANY

By

E. J. Woolever
Vice President

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Attachment

cc: Mr. H. R. Denton, Director NRR (w/a)
Mr. D. Eisenhut, Director Division of Licensing (w/a)
Mr. G. W. Knighton, Chief, Licensing Branch 3 (w/a)
Mr. G. Walton, NRC Resident Inspector (w/a)
Mr. M. Lacitra, Project Manager (w/a)
Ms. M. Ley, Project Manager (w/a)

BACKFIT ITEMS

NO	ITEM	SOURCE	REGULATORY BASIS	EST. COST	BV-2 POSITION
1	Recent studies of "PMP" indicate modification of existing door may be required	Q240; SER OI 1&2	None (Extension of SRP)	50,000	Use of new, extremely conservative hydro met study is beyond scope of SRP and has not been justified by NRC.
2	Provide low-level alarm for rocker arm lube oil resevoir	Q430.119	None (SRP 9.5.7)	50,000	Colt diesels utilize low pressure & hi-level alarms in the rocker arm area.
3	Addition of control room intake radiation monitors	Q410.7, 28 & 53; SRP 6.4; SER OI 53	GDC 19, 0737 III.D.3.4	100,000	BV-2 has recirc duct monitor operator action to isolate on various radiation alarms is adequate.
4	Diesel air dryers	Q430.97 & 100	None (SRP 9.5.6)	500,000	Adequate redundancy exists. Ops. and maint. practices at BV-1 are successful BV-2 design is more tolerant of moisture. No requirement exists.
5	Addition of accumulator isolation valve position indication	SER OI 67	None		
6	Component cooling water flow instrumentation	Q410.19 & 21	GDC 44 (SRP 9.2.2.1)		Sufficient operator info is available. Multiple locked rotors is unlikely.
7	Intentially deleted				
8	Heavy loads upgrade	1/17/84 letter	Restrictive (see GL 81-07); None (SRP 9.1.5)		
9	Addition of fourth steam generator level channel	9/19/83 letter; SER OI 64	IEEE 279-1971		IEEE not applicable to this function.
10	Addition of P-4 testing provision	ICSB SER OI 57	None		
11	Open items from structural audit	SER OI 21	None		
12	BV-1 intake structure analysis	SER OI 23 Struct. Audit	None		Intake Structure Lic. on BV-1 docket.
13	Tech Specs, Rev. 0, vs Rev. 4	NRC Mtg 8/83	None		

BACKFIT ITEMS (continued)

NO	ITEM	SOURCE	REGULATORY BASIS	EST. COST	BV-2 POSITION
14	Containment sump data using draft NUREG, SRP & Reg. Guide	Q480.26; SER OI 52	None		We used a method acceptable to the Commission; the currently <u>approved</u> Reg. GD.
15	Lighting & Communication/diesel not IE	Q430.68	None	over 1 million	Our power sources are sufficiently reliable and no requirement exists.
16	Requirement for Mech EQ Program	Q270.2	None	150,000	Committed to the NRC to perform an EQ program for Mechanical Equipment.
17	Use of CO ₂ in cable spreading area	SER OI 94	App. R, Req's suppression only	10 million + 6 month delay	CO ₂ meets intent of App. R.
18	Use of ASME Code in piping design does not guarantee safety function will be fulfilled	Q210.32	None		BV-2 designed in accordance with 10CFR50.55(a) and ASME III.
19	Seismic EQ 10% margin between test response spectra and req'd. response spectra	Q271.6	Req'd. for seismic EQ from GDG but not req'd. for 10%	Unknown; potentially affects all BOP EQPF	BV-2 is 323.71 and an adequate margin was used, i.e., there is a margin of safety between test response and req'd. response spectra.
20	Cross-training program for operators	SER 13.2.1.2	NUREG 1021		NUREG 1021 has no basis in the SRP or the regulations.
21	Mobil pipeline explosion analyses	Q311.5 through Q311.8	None cited		BVPS-2 has shown, in accordance with Reg. GD. 1.70 and SRP 2.2.3, that an explosion is not a design basis event. No further analyses of effect of an explosion are required.