

# Duquesne Light Company

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JOHN D. SIEBER  
Vice President - Nuclear Group

February 27, 1992

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

Subject: Beaver Valley Power Station, Unit No. 2  
Docket No. 50-412, License No. NPP-73  
IST Program

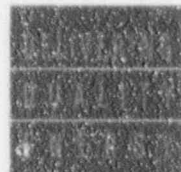
References: a) letter to NRC dated January 31, 1989;  
Submittal of IST Program, Rev. 3  
  
b) letter to NRC dated October 3, 1989;  
Response to Generic Letter 89-04

The purpose of this letter is to identify an open item that we have determined to exist in the Beaver Valley Unit 2 Inservice Test (IST) Program and to provide a schedule date for its resolution.

On January 24, 1992, the NRC issued a supplemental safety evaluation report (SER) regarding the Unit 1 second-interval IST Program. This supplemental SER provided the NRC's review of our alternate methodology for full-stroke exercising certain check valves. The report concluded that because of uncertainties with the alternative test methods, the testing should be revised to meet either Position 1 or Position 2 of Generic Letter 89-04. The revised testing is to be implemented by the next Unit 1 refueling outage which is scheduled to commence in April of 1993. The NRC further concluded that our previous alternate testing (following the alternate methodology for full-stroke exercising check valves) has provided an acceptable level of assurance that the valves will open if required in the interim period until the revised testing can be performed.

DLC had committed, in the Unit 2 IST program submittals referenced above, to utilize the results of the NRC review of the Unit 1 second interval IST Program submittal. The Unit 2 SER dated Dec. 27, 1991, granted valve testing relief requests 6, 8, 10, 11, and 12, which were preapproved by Generic letter 89-04 and were not identified as "anomalies" in Appendix A to the SER. These relief requests address full stroke exercising of the subject valves. However, the NRC had not completed their review of the full-stroke exercise methodology at the time the Unit 2 SER was written. Our methodology had been presented on the Unit 2 docket in our submittal dated January 31, 1989, and on both units dockets on October 3, 1989, (response to Generic Letter 89-04).

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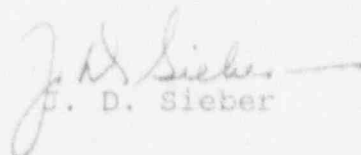
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Unit 2 will begin its third refueling outage on March 13, 1992. All tests are in place and schedules defined for support of this outage. Our current Unit 2 test procedures contain the alternate test methods as discussed in the Unit 1 Supplemental SER. As a result, it is our intent to utilize our current test procedures for the Unit 2 third refueling outage. Per our previous commitment in the above referenced correspondence, we will implement a revised test method for demonstrating a full-stroke exercise of the subject Unit 2 check valves consistent with that developed for Unit 1 prior to the fourth refueling outage, tentatively scheduled for October 1993. The revised test method will be developed in accordance with the schedule the NRC provided in the Unit 1 Supplemental SER (i.e., prior to the ninth refueling outage).

This approach was discussed on January 31, 1992, with our NRC Project Manager, Mr. A. DeAgazio. If you have any questions regarding this submittal, please contact Mr. Steve Sovick at (412) 393-5211.

Sincerely,

  
J. D. Sieber

GSS/cag

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