



## Duquesne Light

Nuclear Construction Division  
Robinson Plaza, Building 2, Suite 210  
Pittsburgh, PA 15205

2NRC-4-076  
(412) 787-5141  
(412) 923-1960  
Telecopy (412) 787-2629  
June 8, 1984

United States Nuclear Regulatory Commission  
Washington, DC 20555

ATTENTION: Mr. George W. Knighton, Chief  
Licensing Branch 3  
Office of Nuclear Reactor Regulation

SUBJECT: Beaver Valley Power Station - Unit No. 2  
Docket No. 50-412  
Response to Instrumentation and Control Licensing Positions

Gentlemen:

Your letter of May 8, 1984, to Mr. E. J. Woolever transmitted instrumentation and control licensing positions (Nos. 1 and 2) for Beaver Valley Power Station Unit 2. The responses to these positions are provided in Attachments 1 and 2.

DUQUESNE LIGHT COMPANY

By E. J. Woolever  
E. J. Woolever  
Vice President

KAT/wjs  
Attachments

cc: Mr. H. R. Denton (w/attachments)  
Mr. D. G. Eisenhut, Director (w/attachments)  
Ms. M. Ley, Project Manager (w/attachments)  
Mr. G. Walton, NRC Resident Inspector (w/attachments)  
Mr. M. Licitra, Project Manager (w/attachments)

SUBSCRIBED AND SWORN TO BEFORE ME THIS  
8th DAY OF June, 1984.

Anita Elaine Reiter  
Notary Public  
ANITA ELAINE REITER, NOTARY PUBLIC  
ROBINSON TOWNSHIP, ALLEGHENY COUNTY  
MY COMMISSION EXPIRES OCTOBER 20, 1986

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COMMONWEALTH OF PENNSYLVANIA )  
 ) SS  
COUNTY OF ALLEGHENY )

On this 24 day of June, 1984, before me,  
a Notary Public in and for said Commonwealth and County, personally  
appeared E. J. Woolever, who being duly sworn, deposed and said that (1) he  
is Vice President 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.

Anita Elaine Reiter  
Notary Public

ANITA ELAINE REITER, NOTARY PUBLIC  
ROBINSON TOWNSHIP, ALLEGHENY COUNTY  
MY COMMISSION EXPIRES OCTOBER 20, 1986

## ATTACHMENT 1

### Response to ICSB Licensing Position No. 1 on Steam Generator Level Control

The staff position on this issue states that "... either the design of the feedwater isolation on a high steam generator level be modified to meet the requirements of paragraph 4.7 of IEEE-STD-279 or an analysis ... be provided to show that the consequences of feedwater addition not being terminated by the high steam generator level signal are not safety significant." Duquesne Light Company understands this requirement to be a backfit as stated in letter 2NRC-4-068 of May 30, 1984. Despite this, however, plant specific analysis had been performed to address any possible concern that may have been raised by the staff position. A copy of the analysis report follows this position. This analysis has shown that the consequences of excessive feedwater addition are not safety significant because, even if such an event should occur, sufficient time is available for the operator to take appropriate action. Therefore, the current steam generator level system design is adequate.