



Duquesne Light

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October 11, 1984

United States Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

SUBJECT: Beaver Valley Power Station - Unit No. 2
Docket No. 50-412
Backfit Status

Gentlemen:

At a meeting between Mr. T. Novak, Mr. E. Case, yourself, and Duquesne Light Co. (DLC) senior management (October 6, 1984), DLC was requested to provide a copy of our backfit status records to the NRC. The attached sheets reflect the status of nine (9) backfits identified by DLC. Our backfit status sheets parallel the status requirements of paragraph V of the Licensing Backfit Procedure (Enclosure 2 of GNLR 84-08) except that they do not include the scheduled completion date for each milestone.

Currently, the last character(s) of the ID numbers in the first column (i.e., L-84-XX) are blank. When the Division of Licensing Plant Specific Backfitting Tracking System reflects those numbers, we plan to use the same numbers for internal tracking.

The remarks in the last column of the status sheets reflect only the highlights of the status. These remarks do not necessarily correspond to the more detailed information supplied in the backfit identification letters referenced in column 2. It should also be noted, that these remarks do not reflect all of the facets of the DLC position which would be submitted at a later date if these issues require appeals.

In reference to Mr. Novak's request at the October 6 meeting, that DLC meet with him concerning other potential backfit issues, we wish to reaffirm our willingness to meet at the earliest mutually convenient date to discuss these issues.

DUQUESNE LIGHT COMPANY

By

E. J. Woolever
Vice President

RW/wjs
Attachment

cc: Mr. T. Novak (w/attachment)
Mr. E. Case "
Mr. H. Denton "

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PLANT SPECIFIC BACKFIT COMPLETION DATES
(Paragraph V. of CNLR 84-08 Enclosure 2)

ID# PLANT ISSUE	ID SOURCE *	SPONSOR ORGANI- ZATION INPUT DATE	DIV. OF LIC. AP- PROVAL & TRANSMIT TO LICENSEE DATE	1st	2nd	APPEALS RQSTD DATE	STAFF & LISCENSEE POSIT- IONS ISSUED DATE	MTG AGENDA ISSUED DATE	APPEAL MTG DATE	MINUTES & DECISION ISSUED DATE	FORMAL APPEAL RQSTD DATE	COST BENEFIT TO DIRECTOR NRR DATE	COST BENEFIT TO LICENSEE DATE	LICENSEE COMMENTS TO DIRECTOR NRR DATE	DECISION BY DIRECTOR NRR DATE	LICENSEE IMPLE- MENT DATE BY NEGOTIA- TION OR ORDER	REMARKS
L-84- Beaver Valley 2	L 05/30/84			1st	2nd												Analysis in accor- dance with HMR-33 & EM 1110-2-1141 is as specified in current SRP 2.4.2.
PMP																	
L-84- Beaver Valley 2	L 05/30/84			1st	2nd												BV-2 system pro- vides equivalent protection to cur- rent BLP/SRP "pre- ferred" system & meets 10CFR50 requirements.
Fire Suppres- sion																	
L-84- Beaver Valley 2	L 05/30/84			1st	2nd												BV-2 system is similar to BV-1, Summar, & Watts Bar (182). Staff position is a new interpretation of IEEE-279.
SG Level																	

*S = Staff Identified
M = Identified at Staff/Licensee Meeting
L = Licensee Identified

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L-84- Beaver Valley 2	L 06/15/84			1st														BV-2 system & pro- cedures provide equivalent reli- ability to guidance of the SRP.
Air Dryer				2nd														
L-84- Beaver Valley 2	L 06/15/84			1st														BV-2 complies with current SRP 7.6 & guidance of BIP- FICSR-4. This issue is a new interpretation of IEEE-279.
Accum MOV				2nd														
L-84- Beaver Valley 2	L 06/15/84			1st														BV-2 analysis is in accordance with current SRP 9.1.3 & BIP 9-2. Staff request is a change to current SRP ac- ceptance criteria.
Fuel Pool				2nd														

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L-84- Beaver Valley 2	L 06/25/84			1st	2nd												No regulations exist for lighting. BV-2 has multiple emergency lighting systems from AC&DC power sources.
Lighting																	
L-84- Beaver Valley 2	L 06/25/84			1st	2nd												Manufacturer design does not recommend level switch. This requirement is beyond the scope of the current SRP.
Diesel Rocker Arm Level																	
L-84- Beaver Valley 2	M 09/13/84			1st	2nd												IE Circular 80-05 guidance is not a requirement. Administrative con- trols ensure use of the fill procedure.
Diesel Lo Fill Proce- dure																	

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