



Duquesne Light

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December 5, 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
Revised Response to Draft SER Outstanding Issue 59
(SWS Isolation on Low Header Pressure)

Gentlemen:

Duquesne Light Company (DLC) submitted information on this issue in letters 2NRC-4-086 of June 20, 1984, and 2NRC-4-141 of September 11, 1984. Subsequent review of this information by your staff has indicated that DLC incorrectly described the design basis of a portion of the Service Water System isolation valve control circuits. This was due in part to the dual function of these valves. The attached revised position is submitted to correct and clarify the information contained in the earlier submittals.

DUQUESNE LIGHT COMPANY

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

KAT/wjs
Attachment

cc: Mr. B. K. Singh, Project Manager (w/a)
Mr. G. Walton, NRC Resident Inspector (w/a)

SUBSCRIBED AND SWORN TO BEFORE ME THIS
5th DAY OF December, 1984.

Anita Elaine Reiter
Notary Public

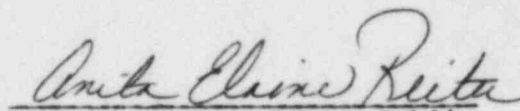
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ANITA ELAINE REITER, NOTARY PUBLIC
ROBINSON TOWNSHIP, ALLEGHENY COUNTY
MY COMMISSION EXPIRES OCTOBER 20, 1986

Boo!

COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF ALLEGHENY)

On this 5th day of December, 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.


Notary Public

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

Revised Position on Outstanding Issue 59 of the
Beaver Valley Power Station Unit No. 2
Draft Safety Evaluation Report

The service water system isolation valves to the turbine plant component cooling water heat exchangers (2SWS*MOV107A through D) perform the safety function of isolating the safety related portion of the service water system from the non-safety portion in the event of a "CIA" signal. This portion of the circuitry is designed to IEEE-STD-279-1971 (IEEE-279). The valves also isolate the safety related portion of the service water system from the non-safety portion in the event of a service water low pressure signal. This portion of the circuit does not conform entirely to IEEE-279 in that the guidance of Sections 4.10 (see FSAR Section 7.1.2.4), 4.17, 4.19, and 4.20 are not met. Since this additional function (low pressure isolation) is not a signal "... that actuate(s) reactor trip ..." or a signal "... that, in the event of a serious reactor accident, actuate(s) engineered safeguards such as containment isolation ...", conformance with IEEE-279 is not considered to be required. This portion of the circuit does, however, conform with IEEE-279 in areas other than those listed above.