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March 12, 1985

United States Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Mr. Harold R. Denton
Office of Nuclear Reactor Regulation

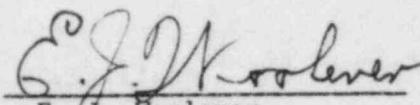
SUBJECT: Beaver Valley Power Station - Unit No. 2
Docket No. 50-412
Additional Backfit Issues

Gentlemen:

Your February 13, 1985, letter to John M. Arthur requested us to identify those issues known by DLC at this time which we have under consideration for implementation of Generic Letter 84-08. We have attached a list of open issues which are presently being discussed with your staff. We hope to resolve these issues without the necessity to submit them for review under the 84-08 backfit procedure.

DUQUESNE LIGHT COMPANY

By


E. J. Woolever
Vice President

GLB/wjs
Attachment

cc: Mr. G. W. Knighton, Chief (w/a)
Mr. T. H. Novak, Assistant Director (w/a)
Mr. B. K. Singh, Project Manager (w/a)
Mr. H. L. Thompson, Director (w/a)
Mr. G. Walton, NRC Resident Inspector (w/a)

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Backfit Issues

Primary/Secondary Stresses - The applicable ASME codes for BVPS-2 do not require consideration of seismic anchor motion and thermal expansion as sources of primary stresses. They have not been considered as such on BVPS-2 and appropriate technical justification has been provided to the NRC. This item is a new interpretation of 10CFR50.55(a) ASME code requirements.

Soil-Structure Interaction - NRR would like free field ground surface motion to be applied at the foundation of plant structures, neglecting effects of soil surrounding the below-ground portions of buildings. This would not only result in significant seismic reanalysis in some cases will result in underconservatism and conflicts with GDC 2.

Seismic Design Response Spectra - The spectra used to design BVPS-2 were approved by NRR at the PSAR stage. Although the spectra have been shown to meet current NRC guidance as well, the NRC has not given approval and continues to request further justifications. Since DLC has demonstrated conformance with the underlying requirements of the SRP and since the staff position in the CP SER was to accept the seismic design response spectra, additional analyses requested of DLC would be interpreted as a change in staff position and would constitute a backfit.