



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

MAY 24 1985

Docket No.: 50-412

APPLICANT: Duquesne Light Company
FACILITY: Beaver Valley Power Station, Unit 2
SUBJECT: PHYSICAL SEPARATION CRITERIA

A meeting was held with Duquesne Light Company (DLC) on Tuesday, December 20, 1983 at NRC Headquarters in Bethesda, Maryland. DLC was accompanied by representatives of Stone & Webster Engineering Corporation. The NRC was represented by members of the Division of Licensing, the Division of Systems Integration and Region I. A list of attendees is included as Enclosure 1.

The purpose of the meeting was to discuss DLC's schedules, plans, and progress in resolving electrical separation issues involved in complying with the criteria of Regulatory Guide 1.75, Revision 2 (R.G. 1.75, Rev.2). The applicant's presentation included an outline of their program for implementation of IEEE Standard 384-1974 as augmented by R.G. 1.75, Rev.2. The program's objectives included identifying preventative actions, such as modified installation practices and training, to eliminate future occurrences of unacceptable separation distances.

The program included revising the Electrical Cable and Raceway Criteria (2BVM-41) and the Electrical Installation Specification (2BVS-931) to include design provisions for meeting separation requirements. Region I noted that earlier discussions with the applicant had indicated that they would be relying mostly on testing to demonstrate that reduced separations were acceptable. However, that has changed significantly and now the applicant's preferred order of separation design provisions is (1) Spatial separation, (2) Tray covers/bottoms, (3) Enclosed raceways, (4) Barriers, (5) Protective wraps/coverings, and finally (6) Analysis and/or tests. DLC has entered into an agreement with Wyle Testing Laboratories to perform plant specific tests and analyses. The NRC inquired as to what type of analysis was expected to be performed. DLC noted that in general analyses would be performed to confirm design adequacy in terms of the IEEE 384-1974 Standard, but there was the possibility that some single failure event analysis would be performed to demonstrate that minimum safeguards for safe plant control and shutdown would remain available for the design configurations being addressed. The staff warned that an NRC review of this type of single failure analysis might be difficult and take some time. The staff suggested that it be used sparingly and when used, identified to the staff as soon as possible. Some of the graphics presented at the meeting depicting the separation design modifications did not, in the NRC's opinion, correspond with IEEE 384-1974 depictions.

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The NRC Power Systems reviewer referring to instrumentation panels, asked if the requirement for 6 inch spacing between safety and non-safety circuits within panels or the inclusion of flexible conduit, or a barrier would be met. DLC said they would consult Westinghouse and respond to our question at a later date.

The NRC also requested an updated schedule and a copy of the presentation made at the meeting be submitted by January 16, 1984. DLC committed to supplying revised copies that would reflect any changes resulting from the day's discussion.

The status of the plant as presented by DLC is that most cases of less than minimum required separation involved vertical separation distances and were between a single division and a non-class 1E raceway. Most violations were noted in the control building, cable tunnel, and cable vault.

At the conclusion of the meeting, the staff expressed the view that the timely completion of activities was critical to the success of the program including the revisions to the Electrical Installation Specification and the development of a detailed tracking system identifying all spatial nonconformances and how they are to be resolved.

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Enclosures:
As stated

cc: See next page

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MEETING: December 20, 1983

Enclosure 1

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MAY 24 1985

MEETING SUMMARY DISTRIBUTION

Docket No(s): 50-412

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