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June 28, 1985

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 Quality Assurance Branch Question 260.64

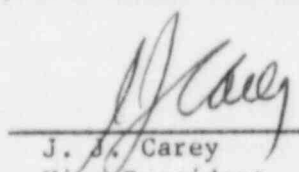
Gentlemen:

This letter forwards response to Quality Assurance Branch Question 260.64.

Upon your concurrence, this response will be included in a future FSAR amendment.

DUQUESNE LIGHT COMPANY

By

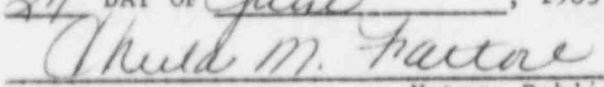

J. J. Carey
Vice President

GHO/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

27 DAY OF June, 1985.


Notary Public

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A PDR

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COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF BEAVER)

On this 27 day of June, 1985, before me, a
Notary Public in and for said Commonwealth and County, personally appeared
J. J. Carey, 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.

Spencer M. Hutton
Notary Public

260.0 Quality Assurance Branch

260.64 Section 17.1.2.2 of the standard format (Regulatory Guide 1.70) requires the identification of safety-related structures, systems, and components controlled by the QA program. You are requested to supplement and clarify the Beaver Valley 2 FSAR in accordance with the following:

- A. The following items do not appear on Table 3.2-1. Add the appropriate items to the table and commit to apply the pertinent QA program requirements to the remaining items during the operations phase or justify not doing so.

Response:

A.1. Biological Shielding

Biological shielding and post-accident shielding are integral parts of the applicable structures listed in Table 3.2-2.

A.2. Missile Barriers

Missile barriers are constructed integrally with, and are considered part of, the applicable structures listed in Table 3.2-2.

A.3. Fabricated Supports

The classification for fabricated supports is consistent with the classification of the system or equipment being supported.

A.4. Items Within the Scope of Regulatory Positions C.2 and C.3 of Regulatory Guide 1.29

Structures, systems, and components designed in accordance with paragraphs C.2 and C.3 of Regulatory Guide 1.29 are designated non-nuclear safety, Seismic Category II, and either QA Category II or III based on their function as defined in Section 3.2.2.3. Standard industry quality control practices will be applied during the operations phase.

A.5. Spent Fuel Pool and Liner

The spent fuel pool is constructed integrally with, and considered part of, the safety-related fuel building listed in Table 3.2-2. The spent fuel pool liner is designated non-nuclear safety, QA Category II based on its function as defined in Section 3.2.2.3. Section 9.1.2.3 has been revised to indicate that the spent fuel pool liner is classified Seismic Category II. Standard industry quality control practices will be applied during the operations phase.

A.6. Fuel Assemblies

Table 3.2-1 will be revised to include fuel assemblies.

A.7. Core Support Structure

See Table 3.2-1, page 22.

A.8. Fuel Transfer System

See Table 3.2-1, page 21.

A.9. Steam Generator Steam Flow Restrictors

Steam generator steam flow restrictors are fabricated integrally with, and considered part of, the steam generator outlet nozzles as listed in Table 3.2-1, page 1.

A.10. Station Stack

Not applicable to BVPS-2.

A.11. Plant Sampling System

See Table 3.2-1, page 9.

A.12. QSS Chemical Injection Pumps

See Table 3.2-1, page 13.

A.13. Reactor Coolant Pump Seals

The BVPS-2 Reactor Coolant Pumps Seals are designated non-nuclear safety. Standard industry quality control practices will be applied during the operations phase.

A.14. Service Building

See Table 3.2-2, page 1.

A.15. Auxiliary Building

See Table 3.2-2, page 1.

A.16. Cable Vault

See Table 3.2-2, page 1.

A.17. Pipe Tunnels

See Table 3.2-2, page 1 (note 2), and page 2 (note 7).

A.18. Foundations For:

(a) Electrical Conduit Ducts (including manholes)

Foundations for electrical conduit ducts (including manholes) are an integral part of the Class 1E cable supports listed in Table 3.2-1, page 24. Also, see response to A.27.c.

(b) Service Water Pipes

BVPS-2 does not have separate foundations for the service water piping.

(c) Sheetpile Retaining Walls Adjacent to Primary Intake Structure

The primary intake structure and sheetpile retaining walls adjacent to the primary intake structure were licensed as part of BVPS-1.

(d) Cooling Water Discharge Pipe

BVPS-2 does not have separate foundations for the cooling water discharge piping.

A.19. Modifications to Site Grading

Any modifications to Site Grading will be designated non-nuclear safety, QA Category III based on its function as defined in Section 3.2.2.3. Standard industry quality control practices will be applied during the operations phase.

A.20. Containment Sump

The Containment Sump is an integral part of the containment structure listed in Table 3.2-2.

A.21. Containment Penetrations, Air Locks, and Access Hatches

See Table 3.2-1, page 24, for containment electrical penetrations. Table 3.2-1 will be revised to include containment piping penetrations, air locks, and access hatches.

A.22. Control Building Radiation Monitor (Outside Air Intake)

The BVPS-2 design does not include an outside air intake control building radiation monitor. The BVPS-2 design utilizes QA Category I control room area radiation monitors. Table 3.2-1 will be revised to include control building area radiation monitors.

A.23. Control Building Chlorine Monitor (Outside Air Intake)

Table 3.2-1 will be revised to include control building chlorine monitor (outside air intake).

A.24. Fuel Building Radiation Monitor

The fuel building radiation monitor is designated non-nuclear safety, QA Category II, based on its function as defined in Section 3.2.2.3. Standard industry quality control practices will be applied during the operations phase.

A.25. Expendable and Consumable Items

When utilized in safety-related systems, the consumable items listed below shall be subject to the pertinent QA program requirements during the operations phase.

- (a) emergency generator diesel fuel
- (b) hydraulic snubber fluids
- (c) reagents
- (d) resins
- (e) boric acid

A.26. Accident Related Meteorological Data Collection Equipment

BVPS does not utilize safety-related meteorological data collection equipment. Meteorological equipment used at BVPS shall be subject to standard industry quality control practices during the operations phase.

A.27. Standby AC Auxiliary Power Systems (Class 1E)

- (a) See Table 3.2-1, pages 9 through 12 and 23. The governor, voltage regulator, and excitation system are an integral part of the Diesel Generator.
- (b) Instrumentation, control and power cables, underground cable splices, connectors, and terminal blocks are considered part of the Class 1E cable listed in Table 3.2-1, page 24.
- (c) Class 1E cable supports are identified in Table 3.2-1, page 24. Table 3.2-1 will be revised to include Class 1E conduit and cable trays.
- (d) Valve operators that are required to perform a safety function are qualified to Class 1E requirements and are included in Table 3.2-1 under instrumentation and controls required to perform a safety function.
- (e) Electrical penetrations of containment are listed in Table 3.2-1, page 24.

Safety-related protective devices used for safety-related circuits passing through containment penetrations will be added to Table 3.2-1. Non-nuclear safety circuits passing through containment penetrations have non-nuclear safety primary and backup protective devices.

- (f) BVPS-2 does not have Class 1E AC lighting batteries.

A.28. DC Power Systems (Class 1E)

- (a) See response to A.27.c.
- (b) Table 3.2-1 will be revised to include battery racks.

- 260.64 B. Provide a commitment that all safety-related instrumentation and controls (I&C) described in Sections 7.1 through 7.6 of the FSAR and other safety-related I&C for safety-related fluid systems will be subject to the pertinent requirements of the FSAR Appendix B QA program. This can be done by a footnote to FSAR Table 3.2-1.

Response:

- B. Instrumentation and controls (I&C) required to perform a safety function are listed in Table 3.2-1. Consequently, all safety-related I&C described in Sections 7.1 through 7.6 and other safety-related I&C for safety-related systems will be subject to the pertinent QA program requirements during the operations phase.

- 260.64 C. Enclosure 2 of NUREG-0737, "Clarification of TMI Action Plan Requirements" (November 1980) identified numerous items that are safety-related and appropriate for OL application and therefore should be on Table 3.2-1. These items are listed below. Add the appropriate items to Table 3.2-1 and provide a commitment that the remaining items are subject to the pertinent requirements of the FSAR operational QA program or justify not doing so.

Response:

- C.1. Reactor Coolant System Vents

The PORVs and the reactor vessel head letdown isolation and throttling valves which provide a safety grade means of venting the reactor coolant system are listed in Table 3.2-1, page 2.

- C.2. Plant Shielding

See response to Item A.1.

- C.3. Valve Position Indication

See response to Part B.

- C.4. Auxiliary Feedwater System

See Table 3.2-1, pages 7 and 8.

- C.5. Auxiliary Feedwater Initiation and Flow

See Table 3.2-1, pages 7 and 8. Also, see response to Part B.

- C.6. Emergency Power for Pressurizer Heaters

The pressurizer heater panels are listed in Table 3.2-1, page 23. The 480V load centers that supply power to these panels are listed in Table 3.2-1, page 23. The emergency power supply for the pressurizer heaters is described in Section 8.3.1 and 8.3.2. Table 3.2-1 will be revised to include pressurizer heaters.

C.7. Dedicated Hydrogen Penetrations

See response to A.21.

C.8. Containment Isolation Dependability

See Table 3.2-1, page 15, and Section 6.2.4.

C.9. Accident Monitoring Instrumentation

See Table 3.2-1, page 20, and response to Part B.

C.10. Instrumentation for Detection of Inadequate Core Cooling

Instrumentation for detection of inadequate core cooling includes core exit thermocouples, RVLIS, and core subcooling margin monitoring equipment. This equipment is safety-related and will be added to FSAR Table 3.2-1.

C.11. Power Supplies for Pressurizer Relief Valves, Block Valves, and Level Indicators

The power supplies for these items are safety-related as described in Section 8.3.1. The pressurizer relief and block valves are listed in Table 3.2-1, page 2. The pressurizer level indicator is part of the instrumentation and controls required to perform a safety function listed in Table 3.2-1, page 3.

C.12. Automatic PORV Isolation

As indicated in Table 1.10-1, an automatic pressurizer power-operated relief valve isolation system is not required for BVPS-2.

C.13. Automatic Trip of Reactor Coolant Pumps

As discussed in Table 1.10-1, automatic trip of reactor coolant pumps is not utilized in the BVPS-2 design.

C.14. PID Controller

As discussed in Table 1.10-1, this item is not applicable to BVPS-2.

C.15. Anticipatory Reactor Trip on Turbine Trip

Instrumentation and controls for anticipatory reactor trip on turbine trip are designated non-nuclear safety and QA Category II or III based on their function as defined in Section 3.2.2.3. This reactor trip is described in Section 7.2.1. Standard industry quality control practices will be applied during the operations phase.

C.16. Power on Pump Seals

The emergency diesel generators are started automatically due to loss of offsite power, thus restoring both seal injection and component cooling water flows within seconds.

C.17. Emergency Plans (and Related Equipment)

Standard industry quality control practices will be applied during the operations phase.

C.18. Equipment and Other Items Associated with Emergency Support Facilities

Standard industry quality control practices will be applied during the operations phase.

C.19. Inplant I₂ Radiation Monitoring

Standard industry quality control practices will be applied during the operations phase.

C.20. Control Room Habitability

Habitability systems are listed in Table 3.2-1, pages 16 through 20 and are described in Section 6.4.