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

JUN 25 1985

Docket No.: 50-412

APPLICANT: Duquesne Light Company (DLC)

FACILITY: Beaver Valley Power Station, Unit 2

SUBJECT: MEETING SUMMARY

On May 9, 1985, NRC and applicant representatives met in Bethesda, Maryland to hear the applicant's appeal on the steam generator channel level requirements for Beaver Valley Power Station, Unit 2 (BVPS-2). A meeting notice is provided as Enclosure 1. A transcript with an attendance roster of this meeting is provided as Enclosure 2.

The affected parties at this meeting presented their cases and participated in discussions regarding the steam generator channel level requirements. After hearing the presentations and discussions, the Director, Division of Licensing, (DL), considered there were two aspects to this issue.

One aspect was technical - specifically identifying hardware changes, such as a fourth steam generator channel level, to the facility that might be needed to meet the requirements. From the information presented at this meeting, the Director, DL, was convinced that there is no undue risk to the public health and safety without the addition of a fourth steam generator channel level for the interim period it will take to resolve and implement an appropriate resolution of the A-47 "Safety Implications of Control Systems" generic issue. The Director, DL, further recognized the following in support of his position:

1. The event of concern, a failure in the control channel leading to a steam generator overfill, should be a relatively small probability because at least two failures in the control channels must occur before the event can occur. Given that the feedwater control system is in automatic, the first failure must be in the steam generator water level channel that is providing input to the control system. It must fail low. The second failure must be on the same steam generator in one of the other two remaining channels and the failure must be a fail-as-is. A third failure may be involved because the operator is not credited with taking any action. Actually, at 100% power, analysis indicates that there are 10 minutes for operator action and this meets the staff position.

2. Prior experience on Unit 1 has shown that an operator has been trained to be quite sensitive to steam generator feedwater control problems and is expected to be prompt in correcting any feedwater mismatch because the actions an operator would need of take to intervene and stop this event are quick and easy.

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3. Based on the history of overfill events of Westinghouse steam generators, no overfill events occurred due to control system failures.

4. In the intermediate power level range, the range in which operators have shortest time to act to prevent a steam generatotr overfill, the applicant noted that the plant will operate less than 2% of the time at these intermediate power levels. During this period, the applicant's present mode of operation requires at least one operator at the feedwater control panel.

5. The applicant agreed to meet any requirements that evolved from the resolution of A-47 to allay steam generator overfill concerns.

Another aspect of this issue was administrative - specifically whether or not 50.55a(h) applies to the BVPS-2 high steam generator level system. The staff noted that this is germane to the issue since the source for the staff authority to establish steam generator channel level requirements is in 50.55a(h). The applicant stated 50.55a(h) did not apply because the steam generator high level trip system is not considered a protection system. The listing in the BVPS-2 FSAR of the feedwater isolation on high steam generator level as an Engineered Safeguards Feature (ESF) appears to be inconsistent with the DLC stated position. DLC has noted that the FSAR incorrectly listed it as an ESF, and the FSAR will be revisied to correct this inconsistency.

The Director, DL, stated that the question of whether or not the BVPS-2 system falls within the rules and regulations would require a legal analysis which he would persue.

Victor Verses

Victor Verses, Project Manager
Licensing Branch No. 3
Division of Licensing

Enclosures:
As stated

cc: See next page

Agenda for the Beaver Valley 2 Backfit Appeal Meeting on Steam Generator Level Channel

1. Discuss safety significance of steam generator overfill.

2. Discussion of NRC and applicant written position and any additional clarification on:

   a. staff requirements
   b. how staff requirements, which can be met by the addition of a fourth steam genertor level channel or alternative, should achieve and maintain an acceptable level of safety
   c. relation of staff requirements to existing regulations
   d. schedule for implementing requirements

Mr. E. F. Kurtz, Jr., Manager
Regulatory Affairs
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JUN 25 1985

MEETING SUMMARY DISTRIBUTION

Docket No(s): 50-412
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GWKnighton
Project Manager V. Nerses
JLee

NRC PARTICIPANTS

H. Thompson
R. Bernero
W. Houston
G. W. Knighton
V. Nerses

bcc: Applicant & Service List

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

Enclosure 1

APR 26 1985

Docket No.: 50-412

MEMORANDUM FOR: George W. Knighton, Chief
Licensing Branch No. 3
Division of Licensing

FROM: Victor Nerses, Project Manager
Licensing Branch No. 3
Division of Licensing

SUBJECT: FORTHCOMING BEAVER VALLEY 2 MEETING BETWEEN THE NRC AND DUQUESNE LIGHT COMPANY

DATE & TIME: Thursday, May 9, 1985
10:30 am

LOCATION: P-110
Phillips Building
Bethesda, Maryland

PURPOSE: Appeal of the requirements on steam generator level channel (refer to enclosed agenda).

PARTICIPANTS: NRC

H. Thompson, R. Bernero, W. Houston, G. Knighton, V. Nerses, et al.

Duquesne Light Company

J. J. Carey, E. Kurtz, et al.

Victor Nerses

Victor Nerses, Project Manager
Licensing Branch No. 3
Division of Licensing

Enclosure: As stated

cc: See next page

*Meetings between NRC technical staff and applicants for licenses are open for interested members of the public, petitioners, intervenors, or other parties to attend as observers pursuant to "Open Meeting Statement of the NRC Staff Policy", 43 Federal Register 28058, 6/28/78. Those interested in attending this meeting should make their intentions known to the Project Manager, V. Nerses, at (301) 492-7238, by no later than noon, May 8, 1985.

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Pittsburgh, Pennsylvania 15279

3. Based on the history of overfill events of Westinghouse steam generators, no overfill events occurred due to control system failures.

4. In the intermediate power level range, the range in which operators have shortest time to act to prevent a steam generatotr overfill, the applicant noted that the plant will operate less than 2% of the time at these intermediate power levels. During this period, the applicant's present mode of operation requires at least one operator at the feedwater control panel.

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Another aspect of this issue was administrative - specifically whether or not 50.55a(h) applies to the BVPS-2 high steam generator level system. The staff noted that this is germane to the issue since the source for the staff authority to establish steam generator channel level requirements is in 50.55a(h). The applicant stated 50.55a(h) did not apply because the steam generator high level trip system is not considered a protection system. The listing in the BVPS-2 FSAR of the feedwater isolation on high steam generator level as an Engineered Safeguards Feature (ESF) appears to be inconsistent with the DLC stated position. DLC has noted that the FSAR incorrectly listed it as an ESF, and the FSAR will be revisied to correct this inconsistency.

The Director, DL, stated that the question of whether or not the BVPS-2 system falls within the rules and regulations would require a legal analysis which he would persue.

/S/

Victor Verses, Project Manager
Licensing Branch No. 3
Division of Licensing

Enclosures:
As stated

cc: See next page

DL:LB#3 VVerses 6/24/85
D/DL HThompson 6/25/85

ORIGINAL

Enclosure 2

UNITED STATES
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF:

DOCKET NO:

BEAVER VALLEY - UNIT 2 BACKFIT APPEAL
MEETING ON STEAM GENERATED WATER
LEVEL CHANNEL INSTRUMENTATION ISSUE

LOCATION: BETHESDA, MARYLAND

PAGES: 1 - 35

DATE: THURSDAY, MAY 9, 1985

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