



## Duquesne Light

Nuclear Construction Division  
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July 9, 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  
Regulatory Guide 1.26 Backfit Issue

REFERENCE: DLC letter no. 2NRC-5-056, dated March 27, 1985

Gentlemen:

In a recent meeting with Mr. L. S. Rubenstein and his staff, it was agreed that the Regulatory Guide (RG) 1.26 backfit issue would be acceptably resolved if Duquesne Light Company (DLC) provided a reasonable discussion which explains why the piping provided as part of the emergency diesel generators is known to be functionally adequate for its purpose. DLC agreed to address the NRC's basic concern and has addressed it in the following manner, which should allow the NRC to conclude that diesel generator piping is safely designed.

As previously stated in the above reference, the diesel generator vendor has stated that non-ASME piping on the BVPS-2 diesel generators is manufactured to the same standards and is of the same materials and schedules as similar diesels already accepted by the NRC. A vendor document titled "Description of Standard Engine PC-2 Piping" specifies pipe sizes, wall thicknesses and material types used on PC-2 engine models. The architect/engineer for BVPS-2 has used this document in evaluating piping used on a similar PC-2 engine for another project. To confirm that the vendor supplied diesel engine piping is conservatively designed, wall thickness, material, and system design pressure were used to calculate minimum wall thicknesses and maximum design pressure. When these calculated values were compared with actual values, safety factors ranging from 200% to 9,000% were found. This type of conservatism is apparently typical of diesel generator vendors in general as evidenced by the number of piping failures which occur. The NRC Public Document Room has provided DLC with a list of diesel generator failures from all licensee event reports. None were attributable to piping failure.

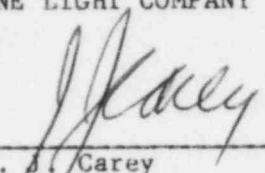
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Since it has been determined that the vendor piping description is directly applicable to BVPS-2, the evaluation and conclusions described above are also directly applicable. This provides DLC with adequate assurance of a functionally conservative piping design. Since the Standard Review Plan recognizes that similarity to previously approved designs is an acceptable basis for acceptance by the staff, we believe this discussion addresses your concern.

DUQUESNE LIGHT COMPANY

By

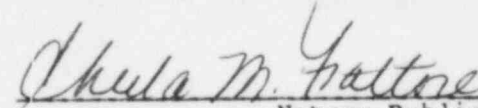
  
J. J. Carey  
Vice President

GLB/wjs  
Attachment

cc: Mr. H. Denton  
Mr. V. Nerses  
Mr. T. Novak  
Mr. L. S. Rubenstein  
Mr. B. K. Singh  
Mr. G. Walton

COMMONWEALTH OF PENNSYLVANIA )  
 ) SS:  
COUNTY OF BEAVER )

On this 9th day of July, 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.

  
Notary Public

SHEILA M. FATTORE, NOTARY PUBLIC  
SHIPPINGPORT BORO. BEAVER COUNTY  
MY COMMISSION EXPIRES SEPT. 16, 1985  
Member, Pennsylvania Association of Notaries