



Duquesne Light

Nuclear Construction Division
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July 9, 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
Partial Exemption from GDC 4

REFERENCES: 1) DLC Letter 2NRC-4-017, dated 2/24/84
2) DLC Letter 2NRC-4-071, dated 5/31/84
3) DLC Letter 2NRC-4-104, dated 7/16/84
4) DLC letter 2NRC-4-183, dated 11/5/84

Gentlemen:

By References 1 through 4, Duquesne Light Company (DLC) requested a partial exemption for General Design Criteria (GDC) 4 of 10CFR50, Appendix A, as it relates to the dynamic effects associated with postulated Reactor Coolant System main loop pipe breaks. The analyses previously provided apply for the life of the plant and the granting of this exemption, as requested, would have accordingly been for the life of the facility. With the NRC now pursuing a change to GDC-4 through the rulemaking process, the lifetime exemption may not be necessary. Therefore, DLC hereby modifies its previous position and requests that this exemption be granted for Beaver Valley Power Station Unit 2 (BVPS-2) for the first two cycles of operation.

DLC, acting on its own behalf and as agent for The Cleveland Electric Illuminating Company, Ohio Edison Company, and The Toledo Edison Company, being co-holder of Construction Permit CPPR-105 for BVPS-2, hereby also requests an amendment to the BVPS-2 Construction Permit (CPPR-105) to reflect the exemption from GDC-4 requested by our letters referenced above and by this letter. As demonstrated by these references, such an amendment to the Construction Permit involves no significant hazards considerations.

Paragraph 3 of the Construction Permit states, in part, as follows:

"This permit shall be deemed to contain and be subject to the said conditions specified in Sections 50.54 and 50.55, of said regulations; is subject to all applicable provisions of the Act, and rules, regulations, and orders of the Commission now or hereafter in effect; ..."

We request that Paragraph 3 be amended by inserting "except to the extent Applicants' obligations thereunder may be modified by duly authorized

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exemptions" after the words "in effect" and before the semicolon. We also request that Paragraph 3.C of the Construction Permit be revised to read as follows:

"This construction permit authorizes the Applicants to construct the facility described in the application and the hearing record, in accordance with the principle architectural and engineering criteria (except to the extent modifications of such criteria may be duly authorized by exemption) and environmental protection commitments set forth therein."

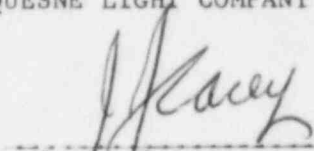
In accordance with 10CFR170.12, enclosed is a check in the amount of \$150 as payment of the application fee.

The DLC letter dated November 5, 1984 (Reference 4), was submitted to explain further our request for partial exemption from GDC-4. This letter cited six areas of potential impact that will result from eliminating the postulated breaks. These six areas are hereby specified to constitute the technical scope of the exemption request and, where different from the scope previously stated in Reference 1, those aspects in Reference 1 are considered to be superseded per the November 5, 1984, letter. Specifically, Items 3, 4, and 5 of the November 5, 1984, letter either supplement or clarify the scope of the request contained in Reference 1; Item 6 of the November 5, 1984, letter indicates that the request is not to be applied to the reactor cavity and subcompartment pressurization analyses, including asymmetric loading.

Your expeditious approval of this exemption request would be greatly appreciated.

DUQUESNE LIGHT COMPANY

By


J. J. Carey
Vice President

JJS/wjs

cc: Mr. B. K. Singh, Project Manager (w/a)
Mr. G. Walton, NRC Resident Inspector (w/a)