



**Duquesne Light**

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DOCKET NUMBER PR-50 (23)  
PROPOSED RULE (50 FR 27006)

DOCKETING  
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September 11, 1985

Secretary of the Commission  
United States Nuclear Regulatory Commission  
Washington, DC 20555

DOCKETING & SERVICE  
BRANCH

ATTENTION: Docketing and Service Branch

SUBJECT: Beaver Valley Power Station - Unit No. 2  
Docket No. 50-412  
Comments on Proposed Rule to Modify General Design Criteria 4

REFERENCE: Modification of General Design Criterion 4 Requirements for  
Protection Against Dynamic Effects of Postulated Pipe Rupture  
(Fed. Reg. Vol. 50, No. 128, pgs. 27006-27009, July 1, 1985)

Gentlemen:

Duquesne Light Company (DLC) submits the following comments on the  
referenced proposed rule to modify General Design Criterion 4.

The proposed rule is considered to be a logical and proper step in  
the process of allowing application of advanced engineering analyses. DLC  
encourages the expeditious issue of the final rule.

As stated in the commentary to the proposed rule, the underlying  
technology is extensible to all high energy piping systems. If the necessary  
technical justification is supplied, analyses to exclude the specific dynamic  
affects of pipe whip and jet discharge for presently postulated pipe ruptures  
beyond the primary coolant loops should also be allowed. Consequently, we  
encourage the expeditious promulgation and implementation of the broader  
scope revision to GDC-4 which would extend the leak-before-break approach to  
pipe crack detection as applied to all high energy piping systems.

DUQUESNE LIGHT COMPANY

By

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