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October 4, 1995

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

**Subject: Beaver Valley Power Station, Unit No. 2**
**Docket No. 50-412, License No. NPF-73**
**Operating License Amendment No. 73 Safety Evaluation Report**

Duquesne Light Company would like to clarify several statements which the Nuclear Regulatory Commission (NRC) included in the Safety Evaluation Report (SER) that supports the approval of Amendment No. 73 to the Beaver Valley Power Station (BVPS) Unit No. 2 Facility Operating License No. NPF-73. The SER statements involve the flow paths for the BVPS Unit No. 2 charging system alternate minimum flow system (AMFS) and normal minimum flow system. A simplified diagram of these systems is attached. There were three statements in the SER which require further clarification, each of which is discussed below.

The first statement in Section 2.0, Background, states, "The subject valve is located in the alternate minimum flow system." As shown in the attached figure, 2CHS*MOV373 is located in the normal minimum flow system.

In the second paragraph of the background section, the NRC states "...the licensee retired the AMFS in place by keeping the subject valve in the open position and removing its SI closure signal." It is true that the AMFS was retired in place. It is also true that 2CHS*MOV373 is maintained in the open position and the safety injection (SI) closure signal for this valve was removed. However, the AMFS was retired in place by closing the valves associated with this system (i.e., 2CHS*MOV383A, B and 2CHS*MOV380A, B) to prevent flow through the AMFS.

The first sentence of Section 3.0, Evaluation, states "In support of the proposed locking open and de-energizing of minimum flow valve 2CHS*MOV373 and the associated revisions to TS 3/4.5.3, new safety analyses were performed by the licensee." The safety analysis which was referred to in the technical specification change request was an analysis of the tube plugging limit which was performed by the Westinghouse Electric Corporation. One of the assumptions for this analysis was that the minimum flow valve is always open. This previously existing analysis, therefore, showed that it is safe to have 2CHS*MOV373 open at all times.

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The above clarifications were discussed with the NRC and it was determined that implementation of Technical Specification Amendment 73 will proceed on schedule. If there are any questions on this issue, please contact Mr. Nelson R. Tonet, Manager, Nuclear Safety Department, (412) 393-5210.

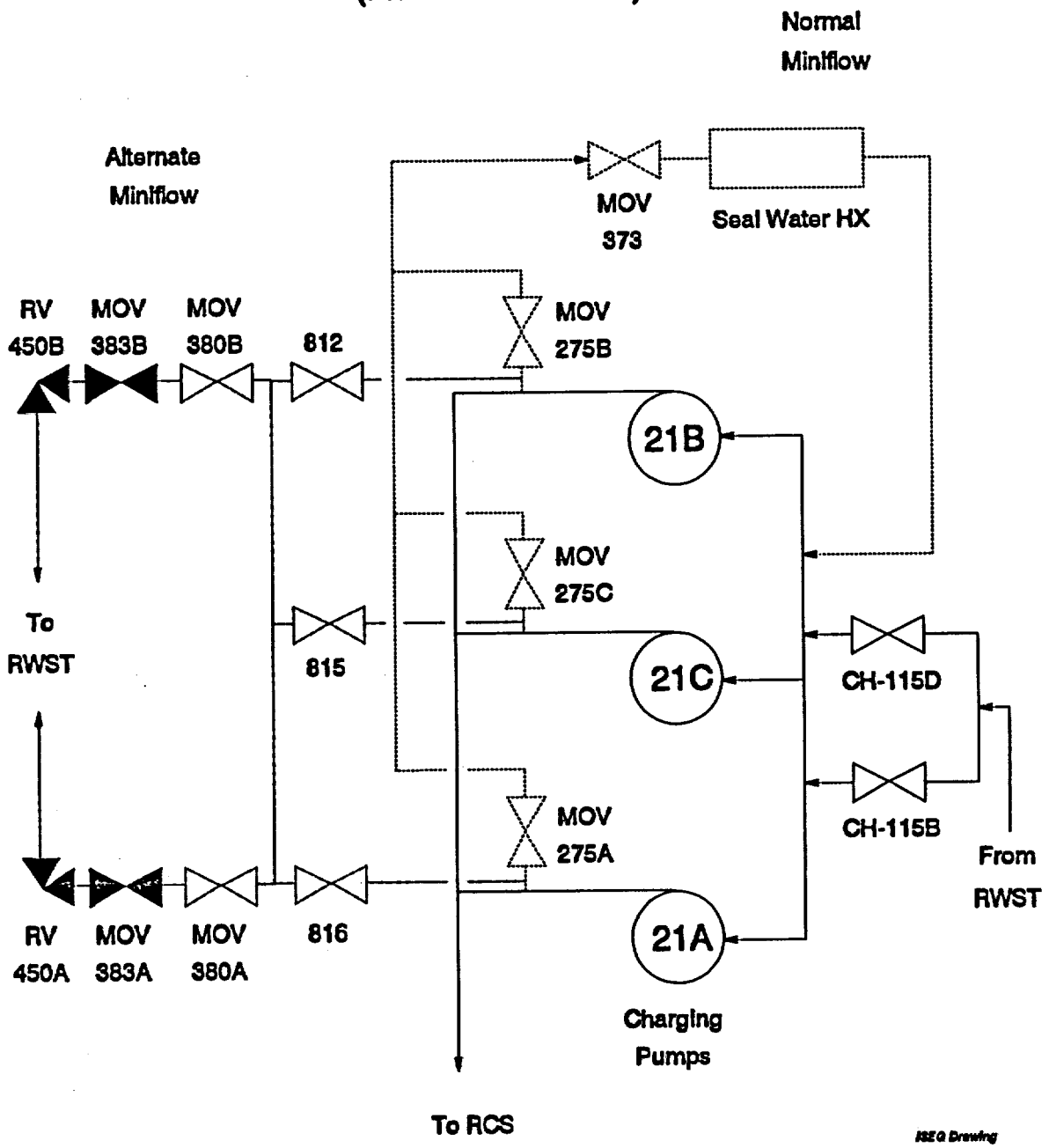
Sincerely,

George S. Thomas

c: Mr. L. W. Rossbach, Sr. Resident Inspector
Mr. T. T. Martin, NRC Region I Administrator
Mr. D. S. Brinkman, Sr. Project Manager
Mr. W. P. Dornsife, Director BRP/DEP
Mr. M. P. Murphy (BRP/DEP)

# BVPS Unit 2
# Miniflow System Arrangement

## (Prior to DCP-2040)




RSEG Drawing
4/25/94