FENOC
FirstEnergy Nuclear Operating Company

Beaver Valley Power Station
Route 168
P.O. Box 4
Shippingport, PA 15077-0004

Mark B. Bezilla
Site Vice President

724-682-5234
Fax: 724-643-8069

November 22, 2002
L-02-105

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
NRC Generic Letter 88-14

This letter forwards a revised response to Generic Letter 88-14, "Instrument Air Supply System Problems Affecting Safety Related Equipment," related to the condensate polishing instrument air system. The revised response is based on 1) information identified during the Latent Issues Review of Unit 1 and Unit 2 compressed air systems, and 2) subsequent verifications required by Generic Letter 88-14.

The original response to Generic Letter 88-14 on February 17, 1989 stated that the Unit 2 condensate polishing air system did not serve any safety-related components and, therefore, was not subject to the provisions of the generic letter. However, it was found that the condensate polishing air compressor, as the designated back-up compressor to the station air compressors, may serve safety related components.

Since the condensate polishing air compressor may serve safety related components, the verifications required by the Generic Letter were addressed as discussed in the attachment to this letter. Based on the verifications discussed in the attachment, no additional actions or commitments are required to address the concerns of Generic Letter 88-14.

There are no regulatory commitments contained in this letter. Any questions pertaining to this subject may be directed to Mr. Larry R. Freeland, Manager, Regulatory Affairs/Performance Improvement at 724-682-5284.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 22, 2002.

Sincerely,

Mark B. Bezilla

Attachment:

CONDENSATE POLISHING AIR COMPRESSOR - RESPONSE TO VERIFICATIONS REQUESTED BY GENERIC LETTER 88-14

c: Mr. D. S. Collins, NRR Project Manager
Mr. D. M. Kern, NRC Sr. Resident Inspector
Mr. H. J. Miller, NRC Region I Administrator

bc: K. A. McMullen
M. E. O'Reilly
Central File - *Keywords: Generic Letter 88-04, Instrument Air*

References:

Condition Report 02-05026

ATTACHMENT

CONDENSATE POLISHING AIR COMPRESSOR RESPONSE TO VERIFICATIONS REQUESTED BY GENERIC LETTER 88-14

1. **Verification by test that actual instrument air quality is consistent with the manufacturer's recommendations for individual components served.**

   The air quality of the instrument air system was tested with the condensate polishing air compressor supplying the system loads on October 15, 2002. The dew point and particulate content met the acceptance criteria set forth in the test and were similar to the values obtained when the station air compressors are supplying the system. No oil or combustibles were detected in the air samples. The acceptance criteria in the test was established based on ISA Standard S7.3. As stated in the original response to the Generic Letter, the review of the vendor recommendations did not identify any requirements more stringent than the ISA Standard. Therefore, the quality of the air supplied by the condensate polishing air compressor has been verified by test to be acceptable for use by safety-related components.

   The air supplied by the condensate polishing air compressor is processed through the same filters and air dryer as the air supplied by the station air compressors. Therefore, it was expected that the results from the test of the condensate polishing air compressor would be similar to the station air compressor results. In addition, flammable/toxic chemicals are not stored nor routinely used in the vicinity of the condensate polishing air compressor; therefore, it was not likely that flammable chemicals would be present in the air. The condensate polishing air compressor is an oil-free compressor, and the presence of oil was also unlikely.

2. **Verification that maintenance practices, emergency procedures, and training are adequate to ensure that safety-related equipment will function as intended on loss of instrument air.**

   Verification that maintenance practices, emergency procedures, and training are adequate on loss of instrument air was completed for the original submittal of the response to the Generic Letter 88-14 and was determined to be acceptable. The use of the condensate polishing air compressor would not affect the station's response on loss of instrument air.

3. **Verification that the design of the entire instrument air system including air or other pneumatic accumulators is in accordance with its intended function, including verification by test that air-operated safety-related components will perform as expected in accordance with all design-basis events, including a loss of the normal instrument air system. This design verification should include an analysis of current air operated component failure positions to verify that they are correct for assuring required safety functions.**

   Verification of the design of the entire instrument air system was completed for the initial submittal of the response to Generic Letter 88-14, and was determined to be acceptable.

The Generic Letter also recommended that a discussion of the program for maintaining proper instrument air quality should be included in the response.

The air supplied by the condensate polishing air compressor is processed through the same filters and air dryer as the air supplied by the station air compressors. In addition, similar to the station air compressors, flammable/toxic chemicals are not stored nor routinely used in the vicinity of the condensate polishing air compressor, making it unlikely that flammable chemicals will be present in the air. The condensate polishing air compressor is an oil-free compressor, and the presence of oil is also unlikely. Therefore, the program for maintaining proper instrument air quality has not changed since the original submittal.

Beaver Valley Power Station completed a latent issues review of the Unit 1 and Unit 2 Compressed Air Systems in June of 2002. The Latent Issues Review Team evaluated system operational health. The evaluation included a review of maintenance and testing activities, design changes, and the preventative maintenance program. The fact that the condensate polishing air compressor was not included in the original response scope for Generic Letter 88-14 was identified by this latent issues review.