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June 9, 1980

Director of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Attn: D. G. Eisenhut, Acting Director
Division of Operating Reactors
Washington, DC 20555

Reference: Beaver Valley Power Station, Unit No. 1
Docket No. 50-334
Five Additional TMI-2 Related Requirements

Gentlemen:

We have carefully reviewed your letter dated May 7, 1980, and your schedule for implementation, and the following are Duquesne Light Company's commitments for Beaver Valley Unit No. 1 with regard thereto.

Item 1.A.1.3 - Shift Manning

We have not received correspondence which provides guidance as to what is required by this item. However, we are aware of IE Circular 80-02 "Nuclear Power Plant Staff Work Hours," and we commit to adopt the guidance of IE Circular 80-02 by August 1, 1980, to the extent that the guidance provided in that Circular is encompassed by the requirements of this item. Without further NRC definition as to what is met by "Personnel Requirements," we are unable to commit to the schedule date set forth in the May 7, 1980, letter.

Item 1.A.3.1 - Revise Scope and Criteria For Licensing Examinations

Effective immediately, Duquesne Light Company commits to the position stated in the March 28, 1980, letter on this subject.

Item 1.C.5 - Procedures For Feedback of Operating Experience to Plant Staff

Duquesne Light Company commits that by January 1, 1981, it shall have reviewed its procedures, revised them as necessary and placed them into effect to assure that operating information pertinent to plant safety, originating both within and outside the utility organization, is continually supplied to operators and other personnel and is incorporated into training and retraining programs.

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Item II.K.3.1 - Install and Test Automatic PORV Isolation System

Duquesne Light Company will commit to studying the feasibility and desirability of the Automatic PORV Isolation System as well as developing a suitable design, if feasible and desirable, by July 1, 1981, and to install and test the system during the next refueling cycle subsequent to July 1, 1981. We are aware of a Westinghouse Owners Group analysis from which the conclusion can be drawn that the failure of an Automatic PORV Isolation System could impair the ultimate heat sink function and increase the intensity of some transients. Further, failure to isolate stuck-open PORVs has been analyzed and no core uncovery results. In addition, plant modifications, procedure changes and operator training required by NUREG 0578 implementation provide assurance that malfunctioning PORVs will be isolated.

Item II.K.3.2 - PORV Failure Report

A generic report on PORV failure will be submitted to the NRC by January 1, 1981.

Item II.K.3.3 - Reporting Safety and Relief Valve Challenge

Further failures of relief and safety valves at Beaver Valley will be reported to the NRC and documented in the annual report.

Item II.K.3.5 - Automatic RCP Trip

In our August 28, 1979, response to IE Bulletin 79-06C, we reference the Westinghouse Owners Group analysis of delayed RCP trip during small break LOCAs documented in WCAP-9584. This WCAP is the basis for the Westinghouse and Owners Group position on RCP trip (I.E.: Automatic RCP trip is not necessary for a Westinghouse PWR since sufficient time is available for manual tripping of the RCPs. This philosophy has been incorporated in the Westinghouse emergency operating instructions which were reviewed and approved by the NRC Bulletins and Orders Task Force and subsequently incorporated in the Beaver Valley Emergency Operating Procedures. In addition, the Westinghouse criteria (basically a RCS pressure below the shutoff head of SI pumps) provides for continued RCP operation and therefore forced circulation and decreased reliance on operator action for non-LOCA events. As requested by the NRC in a letter dated April 15, 1980, and as discussed with the NRC during the May 22, 1980, meeting on this subject, we anticipate that the Westinghouse Owners Group will provide predictions of the LOFT test L3-6. The NRC has indicated that small break tests at the semiscale and LOFT facilities as well as Owners Group test predictions will aid in NRC resolution of this issue. Therefore, we believe that it is not appropriate to take any additional actions on this issue until the results of the NRC sponsored testing (in particular L3-5 and L3-6) and Owners Group predictions are completed and the results evaluated.

Item II.K.3.9 - PID Modification

We understand that for Beaver Valley this modification is accomplished by setting the derivative time constant in the appropriate PID controller to "OFF." This modification will be accomplished prior to plant restart from the current shutdown period.

Item II.K.3.10 - Proposed Anticipatory Trip Modification

We have submitted a request for technical specification change (Amendment No. 46 dated May 14, 1980) which includes this item. We believe that increasing this trip setting to the proposed higher level is important in reducing the number of spurious trips which can challenge plant systems unnecessarily. Particularly below 30 percent power, the plant is subject to increased turbine trips while the feedwater system is being operated manually, bus transfers are taking place and the rod control system is in manual. Except during the startup and shutdown operations, the plant is not operated at low power levels, and therefore, on a percent of operating time basis, challenges to plant systems due to a stuck open PORV is little affected by an increase in setpoint of this anticipatory trip.

Item II.K.3.12 - Confirm Existence of Anticipatory Reactor Trip on Turbine Trip

Beaver Valley has an anticipatory reactor trip on turbine trip.

Item II.K.3.17 - Report On Outage of ECCS Systems

We will prepare a report listing outage dates and lengths and causes of outages for all ECCS systems for the past five years of operation and will submit this report by January 1, 1981.

Item II.K.3.25 - Loss of AC Power On Pump Seals

We do not believe this item is applicable to Beaver Valley.

Item II.K.3.29 - Study to Demonstrate Performance of Isolation Condensers

We do not believe this item is applicable to Beaver Valley.

Item II.K.3.30 - Revised Small Break LOCA Methods To Show Compliance With 10CFR50 Appendix K

The present Westinghouse small break evaluation model used to analyze Beaver Valley is in conformance with 10CFR50 Appendix K. However, Westinghouse has indicated that they will, nevertheless, address the specific NRC items contained in NUREG-0611 in a model change schedule for completion by January 1, 1982.

Item II.K.3.31 - Plant Specific LOCA Analysis To Show Compliance With 10CFR50.46

The present Westinghouse small break evaluation model and small break LOCA analysis for Beaver Valley are in conformance with 10CFR50 Appendix K and 10CFR50.46. As stated in answer to the previous Item II.K.3.30, Westinghouse plans to submit a new small break evaluation model to the NRC for review by January 1, 1982.

If the results of this new Westinghouse model (and subsequent NRC review and approval) indicate that the present small break LOCA analysis for Beaver Valley are not in conformance with 10CFR50.46, a new analysis utilizing the new and approved Westinghouse model will be submitted to the NRC in accordance with the NRC schedule.

Item II.K.3.44 - Evaluation of Anticipated Transients With Single Failure

We do not believe that this item is applicable to Beaver Valley.

Item III.D.3.4 - Control Room Habitability

We have recently reviewed habitability requirements for the control room and have installed chlorine detectors to warn of a chlorine leak of sufficient size to effect habitability. This chlorine detection system, combined with other features described in the FSAR, meet the intent of habitability requirements for the control room.

We will complete the review required by this item by January 1981 and will make necessary control room modifications, if any, by January 1983.

Should you have any questions regarding this response, do not hesistate to contact my office.

Very truly yours,

C. N. Dunn/KAI

C. N. Dunn
Vice President, Operations

cc: Mr. D. A. Beckman, Resident Inspector
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