



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

January 24, 1990

Docket No. 50-334
and 50-412

Mr. J. D. Sieber, Vice President
Nuclear Group
Duquesne Light Company
Post Office Box 4
Shippingport, Pennsylvania 15077

Dear Mr. Sieber:

SUBJECT: BEAVER VALLEY POWER STATION - RESPONSE TO GENERIC LETTER 88-17
WITH RESPECT TO PROGRAMMED ENHANCEMENTS FOR LOSS OF DECAY HEAT
REMOVAL FOR BEAVER VALLEY POWER STATION, UNITS 1 AND 2
(TAC NOS. 69723, 69724)

Generic Letter (GL) 88-17 was issued on October 17, 1988 to address the potential for loss of decay heat removal (DHR) during nonpower operation. In the GL, we requested (1) a description of your efforts to implement the eight recommended expeditious actions of the GL, and (2) a description of the enhancements, specific plans and a schedule for implementation of the six recommended program enhancements. Our review of your efforts on the eight expeditious actions was transmitted by letter dated April 26, 1989.

We have reviewed your response to Generic Letter 88-17 on programmed enhancements in the letters of February 23, 1989 and March 17, 1989. We find that it appears to meet the intent of GL 88-17 but lacks some of the details. Your response to some items is brief and therefore does not allow us to fully understand your actions taken. Therefore, you may wish to consider several observations in order to assure yourselves that the required actions are adequately addressed:

1. You stated that "modifications will be completed at each unit to provide two independent RCS level indications." You further stated that "visible and audible indications of abnormal conditions will be included in any modifications." From these brief and general statements we cannot tell what your two independent level systems consist of or what their accuracies are. In your previous brief description of the level measuring system for expeditious actions, it appeared that in addition to level transmitters you were including a tygon tube for level reading outside the control room. The tygon tube-type of level instrument does not qualify as one of the independent level measurement systems for use under programmed enhancements.

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2. You briefly discussed monitoring of the RHR system when at a reduced inventory or mid-loop condition. You indicated the recording of RHR pump amps, flow and temperature. However, you did not mention that visible and audible indications of abnormal conditions will be included as described in Enclosure 2, Section 3.1.2.4 of GL 88-17.
3. You stated that you are revising procedures addressing normal and off-normal plant operations when entering a reduced inventory condition. In your list of procedures being modified, you included a "containment integrity check list for refueling to verify and maintain containment closure prior to entering a reduced RCS inventory or mid-loop condition." This should be a concern not only for refueling but for any operation while at reduced inventory in order to keep track of and control of the many potential containment openings which may have to be closed simultaneously.

There is no need to respond to the above observations.

As you are aware, the expeditious actions you previously described were an interim measure to achieve an immediate reduction in risk associated with reduced inventory operation, and these are to be supplemented and in some cases replaced by programmed enhancements. In your discussion on modifications for instrumentation you have indicated that the programmed enhancements will be in place for a "target date" that satisfies the time frame stated in the attachment to the GL 88-17. However, although the dates for hardware installation are in agreement with the GL 88-17, it is not apparent that changes not dependent on hardware changes will be performed within the period stipulated (18 months from receipt of the GL 88-17).

We intend to audit your response to the programmed enhancement program. The areas where we do not fully understand your responses as indicated above may be covered in that audit.

This view was performed by Mr. H. Balukjian. As stated before, no response to this letter is needed.

Sincerely,

/s/

Peter S. Tam, Senior Project Manager
Project Directorate I-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page

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Mr. J. Sieber
Duquesne Light Company

Beaver Valley Power Station
Units 1 & 2

cc:

Jay E. Silberg, Esquire
Shaw, Pittmar, Potts and Trowbridge
2300 N Street, N.W.
Washington, DC 20037

Bureau of Radiation Protection
Pennsylvania Department of
Environmental Resources
ATTN: R. Janati
Post Office Box 2063
Harrisburg, Pennsylvania 17120

Kenny Grada, Manager
Nuclear Safety
Duquesne Light Company
P. O. Box 4
Shippingport, Pennsylvania 15077

Mayor of the Borough of
Shippingport
Post Office Box 3
Shippingport, Pennsylvania 15077

John A. Lee, Esquire
Duquesne Light Company
One Oxford Centre
301 Grant Street
Pittsburgh, Pennsylvania 15279

Ashley C. Schannauer
Assistant City Solicitor
City of Pittsburgh
313 City-County Building
Pittsburgh, Pennsylvania 15219

Commissioner Roy M. Smith
West Virginia Department of Labor
Building 3, Room 319
Capitol Complex
Charleston, WV 25305

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19406

John D. Borrows
Director, Utilities Department
Public Utilities Commission
180 East Broad Street
Columbus, Ohio 43266-0573

Resident Inspector
U.S. Nuclear Regulatory Commission
Post Office Box 181
Shippingport, Pennsylvania 15077

Director, Pennsylvania Emergency
Management Agency
Post Office Box 3321
Harrisburg, Pennsylvania 17105-3321