

ATTACHMENT A

Beaver Valley Power Station, Unit No. 2
Proposed Technical Specification Change No. 75

Revise the Technical Specification as follows:

Remove Page

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Insert Page

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TABLE 4.3-1 (Continued)

TABLE NOTATION

- * - With the reactor trip system breakers closed and the control rod drive system capable of rod withdrawal.
- (1) - If not performed in previous 7 days.
- (2) - Heat balance only, above 15% of RATED THERMAL POWER.
- (3) - Compare incore to excore axial imbalance above 15% of RATED THERMAL POWER. Recalibrate if absolute difference \geq 3 percent.
- (4) - (Not used)
- (5) - Each train tested every other month on a STAGGERED TEST BASIS.
- (6) - Neutron detectors may be excluded from CHANNEL CALIBRATION.
- (7) - Below P-10.
- (8) - Below P-6.
- (9) - Required only when below Interlock Trip Setpoint.
- (10) - The CHANNEL FUNCTIONAL TEST shall independently verify the OPERABILITY of the undervoltage and shunt trip circuits for the Manual Reactor Trip Function. The test shall also verify the OPERABILITY of the Bypass Breaker trip circuit(s). # ADD
- (11) - The CHANNEL FUNCTIONAL TEST shall independently verify the OPERABILITY of the undervoltage and shunt trip attachments of the Reactor Trip Breakers.
- (12) - Local manual shunt trip prior to placing breaker in service.
- (13) - Automatic undervoltage trip. The specified surveillance interval during the first fuel cycle may be extended to coincide with completion of the first refueling outage.

ADD

Complete verification of OPERABILITY of the manual reactor trip switch circuitry shall be performed prior to startup from the first shutdown to MODE 3 occurring after April 6, 1993

ATTACHMENT B

Beaver Valley Power Station, Unit No. 2 Proposed Technical Specification Change No. 75 REVISION OF TABLE 4.3-1'S TABLE NOTATION (10)

A. DESCRIPTION OF AMENDMENT REQUEST

The proposed change would be a one-time revision to the Beaver Valley Power Station Unit No. 2 Technical Specifications Table 4.3-1 titled, "Reactor Trip System Instrumentation Surveillance Requirements," Table Notation (10). The specific revision to the Table Notation (10) would be to add a footnote which states the following: "Complete verification of OPERABILITY of the manual reactor trip switch circuitry shall be performed prior to startup from the first shutdown to MODE 3 occurring after April 6, 1993."

B. BACKGROUND

On April 5, 1993, the Beaver Valley Power Station (BVPS) identified a potential testing inadequacy for the reactor trip breakers and reactor trip bypass breakers. This potential testing inadequacy was discovered as a result of an evaluation of NRC Information Notice 93-15, "Failure to Verify The Continuity of Shunt Trip Attachment Contacts In Manual Safety Injection and Reactor Trip Switches," which describes a similar surveillance testing inadequacy at another plant. Station management was apprised of the issue and directed that a thorough review of reactor trip breaker procedures be conducted expeditiously. It was determined that the 18 month surveillance testing program for the reactor trip breakers and reactor trip bypass breakers has not adequately tested one aspect of the breaker trip circuitry. In particular, the surveillance test for the Manual Reactor Trip function did not adequately test the direct shunt trip circuit continuity from the Main Control Board manual reactor trip switches to the shunt trip coil. Therefore, we concluded that the trip breaker testing was not performed in compliance with all aspects of the Technical Specifications. We further evaluated the potential to perform the on-line testing of the shunt trip circuit. Due to the complexity of the testing involved, we determined that it would be imprudent to conduct such a complex test procedure during power operation with its attendant trip potential.

Discretionary enforcement was requested and approved on April 6, 1993 for BVPS Unit No. 2 regarding the requirements of Technical Specification Surveillance Requirement 4.3.1.1.1, Table 4.3-1 Functional Unit 1, Manual Reactor Trip, Table Notation (10).

This approval permits BVPS Unit No. 2 to avoid an unnecessary plant transient for the period of time required for the NRC staff to process an exigent license amendment in accordance with 10 CFR 50.91(a)(6). The exigent process is necessary as a condition of the NRC policy statement published in the Federal Register (58 FR 14308) on March 17, 1993, addressing the exercise of discretion for an operating facility (10 CFR 2, Appendix C). This amendment request fulfills the commitment made in our April 6, 1993 request for discretionary enforcement.

C. JUSTIFICATION

The testing program inadequacy notwithstanding, Duquesne Light Company has determined that, based on extensive surveillance testing and in the presence of the diverse trip features (undervoltage and shunt trip device), the reactor trip breakers and reactor trip bypass breakers are fully functional and capable of opening in response to a Main Control Board manual trip actuation.

Independent verification of the manual shunt trip was performed during pre-operational shunt trip installation testing. At least once per 18 months, opening of both reactor trip breakers has been initiated by use of one of the two manual reactor trip switches in the control room. This operation does not verify that both the shunt and undervoltage features function independently. However, it does verify that the trip breakers will be opened by at least one of the two diverse means required. Credit for the manual trip is taken only as a backup to the automatic reactor trip functions in Chapter 15 of the Beaver Valley Updated Final Safety Analysis Report (UFSAR). Alternate means of shutting down the reactor if the manual switches on the Main Control Board panels do not function are listed in Emergency Operating Procedure FR-S.1. These include: local manual operation of the breakers supplying power to the rod drive motor generator sets, thus removing holding power to the control rods; local operation of the reactor trip breakers; manual rod insertion; and emergency boration. This situation, therefore, does not represent a significant safety concern in that the equipment has been tested and existing procedures assure that the plant will respond properly to transient conditions.

Duquesne Light Company Operations Department supervision has discussed the surveillance discrepancy during the preshift briefing with each operating crew. Also, an on-shift required reading package will be provided to each licensed individual. The briefing and required reading will discuss the testing inadequacy and actions to take in the event that a manual reactor trip actuation is necessary and does not initiate the reactor trip. Beaver Valley Power Station conducts training on anticipated transient without scram (ATWS) events, including simulator training.

The maximum duration of the proposed amendment is until the fourth refueling outage, which is currently scheduled to begin on September 17, 1993. During the upcoming refueling outage, the applicable requirements of Technical Specification Surveillance Requirement 4.3.1.1.1 will be fully met, including the Manual Reactor Trip Surveillance Test. Should BVPS Unit No. 2 experience a planned or unplanned shutdown requiring an entry into MODE 3 prior to the refueling outage, the current surveillance requirement for the Manual Reactor Trip, specified by Table Notation (10) for Table 4.3-1, will be performed prior to the plant re-entering MODE 2.

Therefore, we feel that the proposed change request is justified for the limited time period based on the fact that the reactor trip breakers and reactor trip bypass breakers are fully functional and capable of opening in response to a Main Control Board manual trip actuation.

D. SAFETY ANALYSIS

The reactor trip system possesses several diverse and independent features which enable it to shutdown the reactor on demand. The operation of any of these features demonstrates that the reactor protection system is capable of performing its safety function. Therefore, given that surveillance tests performed on the reactor trip system did not adequately test one aspect of the system, the reactor protection system still possesses sufficient diverse and independent features to enable it to perform its design function.

The ability of the Solid State Protection System (SSPS) to initiate a reactor trip via the undervoltage coil and indirectly energize the shunt trip coil has been verified. Should a reactor trip be required, this is the portion of the reactor trip system which would likely function to open the reactor trip breakers. It is unlikely that a manual reactor trip would be required. In the unlikely event that the operator was required to initiate a manual reactor trip and the signal did not reach the shunt trip coil, de-energization of the undervoltage coil would cause the reactor trip breakers to open. Additionally, when the undervoltage coil de-energizes, the auto shunt trip relay (STA) also de-energizes. This action closes a contact which will energize the shunt trip coil and open the reactor trip breakers. (Refer to Figure 1, Attachment D.)

Therefore, this change is considered safe based on the continued ability of the reactor trip system to function as designed with no adverse impact as a result of the delay in performing the Operating Surveillance Test (OST) on the reactor trip breakers. Since the response of the plant is unchanged, there is no significant safety impact resulting from the delay in performing the complete verification of operability of the manual reactor trip function which would be permitted by this proposed change request.

E. NO SIGNIFICANT HAZARDS EVALUATION

The no significant hazard considerations involved with the proposed amendment have been evaluated, focusing on the three standards set forth in 10 CFR 50.92(c) as quoted below:

The Commission may make a final determination, pursuant to the procedures in paragraph 50.91, that a proposed amendment to an operating license for a facility licensed under paragraph 50.21(b) or paragraph 50.22 or for a testing facility involves no significant hazards consideration, if operation of the facility in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

The following evaluation is provided for the no significant hazards consideration standards.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The probability or consequences of an accident previously evaluated is not significantly increased. The reactor trip breaker shunt and undervoltage trip actuation circuitry is redundant and reliable. Should the manual actuation of the shunt trip fail to operate, the diversity and redundancy of the reactor protection system would enable it to perform its design function. If a manual reactor trip signal did not reach the shunt trip coil, the de-energization of the undervoltage relay would cause the reactor trip breakers to open. Additionally, when the undervoltage relay is de-energized, the auto shunt trip relay (STA) also is de-energized. This action closes a contact which will energize the shunt trip coil and open the reactor trip breakers.

An additional back-up to the manual reactor trip function is contained in the Emergency Operating Procedures. These procedures direct the plant operators to perform the following actions in the event that the reactor trip breakers do not open when required:

1. Manually inserting control rods, and
2. Initiation of an emergency boration, and
3. Local opening of the reactor trip breakers and de-energization of the motor generator sets.

Therefore, since the response of the plant to an accident is unchanged, there is no significant increase in either the probability or consequences of an accident previously evaluated as a result of this proposed change.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed change does not affect the operation or response of any plant equipment or introduce any new failure mechanisms. The current accident analyses are unchanged and bound all expected plant transients.

Therefore, this proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the change involve a significant reduction in a margin of safety?

The ability of the Solid State Protection System (SSPS) to initiate a reactor trip via the undervoltage coil and indirectly energize the shunt trip coil has been verified. Should a reactor trip be required, this is the portion of the reactor trip system which would likely function to open the reactor trip breakers. It is unlikely that a manual reactor trip would be required. In the unlikely event that the operator was required to initiate a manual reactor trip and the signal did not reach the shunt trip coil, the de-energization of the undervoltage coil would cause the reactor trip breakers to open. Additionally, when the undervoltage coil is de-energized, the auto shunt trip relay (STA) is also de-energized. This action closes a contact which will energize the shunt trip coil and open the reactor trip breakers.

The reactor trip system will continue to function as designed with no adverse impact as a result of the delay in performing the Operating Surveillance Test (OST) on the reactor trip breakers. Since the response of the plant is unchanged, there is no significant safety impact resulting from the delay in performing the surveillance testing.

The reactor trip breakers and reactor trip bypass breakers are fully functional and capable of opening in response to a Main Control Board manual trip actuation. Therefore, the proposed license amendment does not impact accident analyses or the associated radiological consequences nor does it impact systems associated with the control of radiological or non-radiological effluents.

Therefore, this proposed change does not involve a significant reduction in a margin of safety.

F. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Based on the considerations expressed above, it is concluded that the activities associated with this license amendment request satisfy the no significant hazards consideration standards of 10 CFR 50.92(c) and, accordingly, a no significant hazards consideration finding is justified.

ATTACHMENT C

Beaver Valley Power Station, Unit No. 2
Proposed Technical Specification Change No. 75

Typed Page: 3/4 3-13

TABLE 4.3-1 (Continued)

TABLE NOTATION

- * - With the reactor trip system breakers closed and the control rod drive system capable of rod withdrawal.
- (1) - If not performed in previous 7 days.
- (2) - Heat balance only, above 15% of RATED THERMAL POWER.
- (3) - Compare incore to excore axial imbalance above 15% of RATED THERMAL POWER. Recalibrate if absolute difference \geq 3 percent.
- (4) - (Not used)
- (5) - Each train tested every other month on a STAGGERED TEST BASIS.
- (6) - Neutron detectors may be excluded from CHANNEL CALIBRATION.
- (7) - Below P-10.
- (8) - Below P-6.
- (9) - Required only when below Interlock Trip Setpoint.
- (10) - The CHANNEL FUNCTIONAL TEST shall independently verify the OPERABILITY of the undervoltage and shunt trip circuits for the Manual Reactor Trip Function. The test shall also verify the OPERABILITY of the Bypass Breaker trip circuit(s).#
- (11) - The CHANNEL FUNCTIONAL TEST shall independently verify the OPERABILITY of the undervoltage and shunt trip attachments of the Reactor Trip Breakers.
- (12) - Local manual shunt trip prior to placing breaker in service.
- (13) - Automatic undervoltage trip. The specified surveillance interval during the first fuel cycle may be extended to coincide with completion of the first refueling outage.

Complete verification of OPERABILITY of the manual reactor trip switch circuitry shall be performed prior to startup from the first shutdown to MODE 3 occurring after April 6, 1993.

ATTACHMENT D

Beaver Valley Power Station, Unit No. 2
Proposed Technical Specification Change No. 75

Unit No. 2 Request for Technical
Specification Discretionary Enforcement
Dated April 6, 1993

Duquesne Light Company

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

April 6, 1993

JOHN D. SIEBER
Senior Vice President and
Chief Nuclear Officer
Nuclear Power Division

(412) 393-5255
Fax (412) 643-8069

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

**Subject: Beaver Valley Power Station, Unit No. 2
Docket No. 50-412, License No. NPF-73
Request for Discretionary Enforcement**

This letter provides our request for NRC discretionary enforcement regarding the requirements of Technical Specification Surveillance Requirement 4.3.1.1.1. Additional details supporting this request are located in the enclosure which has been prepared in accordance with the NRC's policy statement as documented in the Federal Register dated March 17, 1993 (58 FR 14308). This request has been reviewed by our Onsite Safety Committee (OSC) and is determined to be safe. Discretionary enforcement is requested for the period of time it takes to issue an emergency technical specification change in accordance with 10 CFR 50.91. We will submit an exigent change by April 16, 1993.

Questions regarding this submittal may be directed to G.S. Sovick at (412) 393-5211.

Sincerely,

John D. Sieber for
J. D. Sieber

Attachment

cc: Mr. L. W. Rossbach, Sr. Resident Inspector
Mr. T. T. Martin, NRC Region I Administrator
Mr. G. E. Edison, Project Manager
Mr. M. L. Bowling (VEPCO)

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Evaluation Supporting Discretionary Enforcement:
Beaver Valley Power Station - Unit No. 2
Docket No. 50-412 License No. NPF-73

BACKGROUND

On April 5, 1993, the Beaver Valley Power Station Instrumentation and Control Section identified a potential testing inadequacy for the reactor trip breakers and reactor trip bypass breakers. This potential testing inadequacy was discovered as a result of an evaluation of NRC Information Notice 93-15, "Failure to Verify The Continuity of Shunt Trip Attachment Contacts In Manual Safety Injection and Reactor Trip Switches," which describes a similar surveillance testing inadequacy at another plant. Station management was apprised of the issue and directed that a thorough review of reactor trip breaker procedures be conducted expeditiously. It was determined that the 18 month surveillance testing program for the reactor trip breakers and reactor trip bypass breakers may not have adequately tested one aspect of the breaker trip circuitry. Therefore, it has been concluded that the trip breaker testing was not performed in compliance with all aspects of the Technical Specifications. Duquesne Light Company has evaluated the potential to perform the proper testing of the shunt trip circuit. Due to the complexity of the testing involved, we feel that it would be imprudent to conduct such a complex test procedure during power operation with its attendant trip potential.

Duquesne Light Company requests discretionary enforcement regarding the requirements of Technical Specification Surveillance Requirement 4.3.1.1.1, Table 4.3-1 Functional Unit 1, Manual Reactor Trip, Table Notation 10. As discussed above, Duquesne Light Company has not tested one specific aspect of the Manual Reactor Trip function during its 18 month surveillance testing program for the reactor trip breakers and reactor trip bypass breakers and, therefore, has not fully complied with the intent of Table Notation 10. In particular, the surveillance test for the Manual Reactor Trip function does not adequately test the direct shunt trip circuit continuity from the Main Control Board manual reactor trip switches to the shunt trip coil.

1. Safety Basis (evaluation of the safety significance and potential consequences of the proposed course of action):

Independent verification of the manual shunt trip was performed during pre-operational and shunt trip installation testing. At least once per 18 months, opening of both reactor trip breakers has been initiated by use of one of the two manual reactor trip handswitches in the control room. This operation does not verify that both the shunt and undervoltage features function independently. However, it does verify that the trip breakers would be opened by at least one of the two diverse means required. Credit for the manual trip is taken only as a backup to the automatic reactor trip functions in Chapter 15 of the Beaver Valley Final Safety Analysis Report (FSAR). Alternate means of shutting down the reactor if the manual switches on main control board panels do not function, are listed in Emergency Operating Procedures FR-S.1. These include: local manual operation of the breakers supplying power to the rod drive motor generator sets, thus removing holding power to the control rods; local operation of the reactor trip breakers; manual rod insertion; and emergency boration. This situation, therefore, does not represent a significant safety concern in that the equipment that has been tested as well as the existing procedures assure that the plant will respond to transient conditions. This testing program inadequacy notwithstanding, we have determined that, based on extensive surveillance testing, and in the presence of the diverse trip features (undervoltage and shunt trip attachment), the reactor trip breakers and reactor trip bypass breakers are fully functional and capable of opening in response to a Main Control Board manual trip actuation.

2. Description of compensatory measures:

Duquesne Light Company Operations Department supervision will discuss the surveillance discrepancy during the preshift briefing with each operating crew. Also, an on-shift required reading package will be provided to each licensed individual. The briefing and required reading will discuss the testing inadequacy and actions to take in the event that a manual reactor trip actuation is necessary and does not initiate the reactor trip. Beaver Valley Power Station conducts training on anticipated transient without scram (ATWS) events, including simulator training. Emergency operating procedures provide for the following actions in the event that the reactor trip breakers do not open when demanded:

1. Manual inserting rod insertion,
2. Initiation of an emergency boration, and
3. Local opening of the reactor trip breakers and de-energization of the motor generator sets.

3. Justification for the duration of the request:

The duration of the requested waiver is until the fourth refueling outage, which is currently scheduled to begin on September 17, 1993. During the upcoming refueling outage, the applicable provisions of Technical Specification Surveillance Requirement 4.3.1.1.1 will be fully performed, including the Manual Reactor Trip Surveillance Test. Should Beaver Valley Power Station Unit 2 experience a planned or unplanned shutdown requiring an entry into MODE 3 prior to the refueling outage, the Manual Reactor Trip Surveillance Test will be completed.

This testing program inadequacy notwithstanding, Duquesne Light Company has determined that based on extensive surveillance testing, and in the presence of the diverse trip features (undervoltage and shunt trip attachment), the reactor trip breakers and reactor trip bypass breakers are fully functional and capable of opening in response to a Main Control Board manual trip actuation or manual safety injection actuation.

4. Basis for the conclusion that the request does not have a potential adverse impact on the public health and safety:

Duquesne Light has determined that there is no significant safety impact associated with this request for discretionary enforcement associated with the requirements of Technical Specification Surveillance Requirement 4.3.1.1.1, Table 4.3-1, Functional Unit 1, Manual Reactor Trip. Although the surveillance test did not adequately test one aspect of the manual reactor trip function, there is no reason to believe that any element of the manual trip function is not functional. Duquesne Light believes that based on the surveillance testing performed, the manual reactor trip function is fully functional and capable of performing its design function if called upon to do so.

The reactor trip system possesses several diverse and independent features which enable it to shutdown the reactor on demand. The operation of any of these features demonstrates that the reactor protection system is capable of performing its safety function. Therefore, given that surveillance tests performed on the reactor trip system did not adequately test one aspect of the system, the reactor protection system still possesses sufficient diverse and independent features to enable it to perform its design function.

The surveillance testing performed on the reactor trip breakers and the reactor trip bypass breakers was inadequate in that the capability of the manual reactor trip switches, located on the main control board, to directly actuate the shunt trip coil was not positively verified. However, the procedure does verify the capability of the manual reactor trip switches to trip the reactor via actuation of the undervoltage relay. The procedure verifies the operation of the shunt trip coil, however, it does not differentiate actuation from the benchboard switch contacts versus the undervoltage interfacing relay. (See Figure 1 attached.)

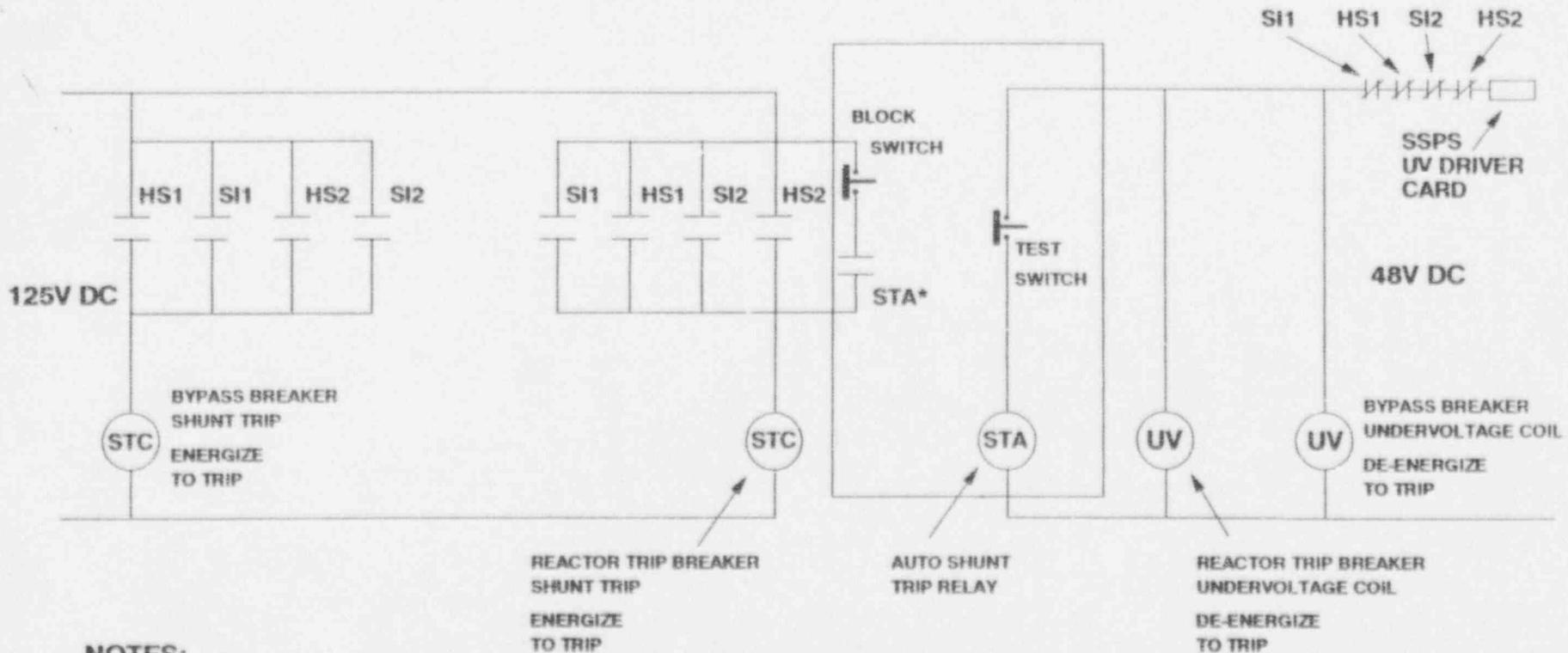
The ability of the reactor Solid State Protection System (SSPS) to initiate a reactor trip via the undervoltage coil and indirectly energize the shunt trip coil has been verified. Should a reactor trip be required, this is the portion of the reactor trip system which would likely function to open the reactor trip breakers. It is unlikely that a manual reactor trip would be required. In the unlikely event that the operator was required to initiate a manual reactor trip and the signal did not reach the shunt trip coil, the de-energization of the undervoltage relay would cause the reactor trip breakers to open. Additionally, when the undervoltage relay is de-energized, the auto shunt trip relay (STA) also de-energized. This action closes a contact which will energize the shunt trip coil and open the reactor trip breakers.

Therefore, the reactor trip system will continue to function as designed with no adverse impact as a result of the delay in performing the operations surveillance test on the reactor trip breakers. Since the response of the plant is unchanged, there is no significant safety impact resulting from the delay in performing the surveillance testing.

5. Basis for the conclusion that the request does not involve adverse consequences to the environment:

The requested discretionary enforcement involves no adverse environmental consequences. The reactor trip breakers and reactor trip bypass breakers are fully functional and capable of opening the breakers in response to a Main Control Board manual trip actuation. Therefore, the testing inadequacy does not impact accident analyses or the associated radiological consequences nor does it impact systems associated with the control of radiological or non-radiological effluents.

BEAVER VALLEY POWER STATION UNIT 2 AUTO/MANUAL REACTOR TRIP CIRCUIT



NOTES:

- BENCH BOARD SECTION A REACTOR TRIP SWITCH OPERATES HS1 CONTACTS. ALL SI1 CONTACTS OPERATE SIMULTANEOUSLY
- BENCH BOARD SECTION B REACTOR TRIP SWITCH OPERATES HS2 CONTACTS. ALL SI2 CONTACTS OPERATE SIMULTANEOUSLY
- BENCH BOARD SECTION A1 SAFETY INJECTION SWITCH OPERATES SI1 CONTACTS. ALL HS1 CONTACTS OPERATE SIMULTANEOUSLY
- BENCH BOARD SECTION A2 SAFETY INJECTION SWITCH OPERATES SI2 CONTACTS. ALL HS2 CONTACTS OPERATE SIMULTANEOUSLY

* CONTACT 'STA' CLOSSES WHEN RELAY 'STA' DE-ENERGIZES

FIGURE 1

ATTACHMENT E

Beaver Valley Power Station, Unit No. 2
Proposed Technical Specification Change No. 75

NOTICE OF ENFORCEMENT DISCRETION
FOR DUQUESNE LIGHT COMPANY REGARDING
BEAVER VALLEY UNIT NO. 2



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20545

April 9, 1993

Docket No. 50-412
NOED No. 93-6-010

Mr. J. D. Sieber, Senior Vice President
and Chief Nuclear Officer
Nuclear Division
Duquesne Light Company
Post Office Box 4
Shippingport, Pennsylvania 15077-0004

Dear Mr. Sieber:

SUBJECT: NOTICE OF ENFORCEMENT DISCRETION FOR DUQUESNE LIGHT COMPANY
REGARDING BEAVER VALLEY UNIT 2 (TAC NO. M86129)

This letter confirms that on April 6, 1993 we orally granted your request to exercise discretionary enforcement for a surveillance test of the manual reactor trip function at Beaver Valley Unit 2.

By letter dated April 6, 1993 (enclosure), you requested the U.S. Nuclear Regulatory Commission (NRC) to exercise its discretion not to enforce compliance with the required actions in Technical Specifications (TS) Surveillance Requirement 4.3.1.1.1, Table 4.3-1, Functional Unit 1, Manual Reactor Trip, Table Notation 10. You informed the NRC by telephone on April 5, 1993 that Beaver Valley Unit 2 has not tested one specific aspect of the manual reactor trip function during its 18 month surveillance testing program for the reactor trip breakers and reactor trip bypass breakers; therefore, Beaver Valley 2 has not fully complied with the intent of Table Notation 10. It was further noted that, because of the complexity of the testing involved, it would be imprudent to perform the test during power operation. Duquesne Light Company (DLC) proposed to continue power operation, and to perform the required surveillance test, using a revised procedure, prior to restart after the next time Unit 2 enters MODE 3 operation, whether for a planned or unplanned outage. You also noted the next planned outage for Unit 2 would begin September 17, 1993.

As justification for your request you provided the following rationale:

1. The primary function to trip the reactor is the automatic reactor trip function. The manual trip serves only as a backup to the automatic trip in the Final Safety Analyses Report.
2. Independent verification of the manual shunt trip was performed during pre-operational and shunt trip installation testing.

April 9, 1993

3. At least once per 18 months, opening of both reactor trip breakers has been initiated by use of one of the two manual reactor trip handswitches in the control room. This verifies that the trip breakers would be opened by at least one of the two diverse means (undervoltage and shunt trip attachment) required.
4. Alternate means of shutting down the reactor if the manual switches on main control board panels do not function are listed in Emergency Operating Procedure FR-S.1.
5. You have determined, based on extensive surveillance testing, and in the presence of the diverse trip features, the reactor trip breakers and reactor trip bypass breakers are fully functional and capable of opening in response to a main control board manual trip actuation.

In addition you identified compensatory measures which will be taken, some of which already exist, to further minimize any risk associated with delaying compliance with TS 4.3.1.1.1. These measures include the following:

1. DLC operations supervision will discuss the surveillance discrepancy with each operating crew during a preshift briefing.
2. An on-shift required reading package will be provided to each licensed operator. The required reading (and preshift briefing) will discuss the testing inadequacy and actions to take should a manual trip be undertaken but fail to initiate the trip.
3. Training (including simulator training) is given to all licensed operators on anticipated transient without scram (ATWS) events.
4. Emergency procedures provide for the following actions if reactor trip breakers fail to open on demand:
 - a) manual control rod insertion,
 - b) initiation of emergency boration, and
 - c) local opening of reactor trip breakers and de-energization of motor-generator sets.

Based on our review of your justification, including the compensatory measures identified above, we have concluded that this course of action involves minimum or no safety impact, and we are clearly satisfied that this exercise of enforcement discretion is warranted from a public health and safety perspective. Therefore, it is our intention to exercise discretion

Mr. J. D. Sieber

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April 9, 1993

not to enforce compliance with 10 CFR 43.1.1.1, Table 4.3-1, Notation 10 for the period from April 5, 1993 until restart after the next time Unit 2 enters MODE 3 operation. However, we will consider enforcement action, as appropriate, for the conditions that led to the need for this exercise of enforcement discretion.

Sincerely,



Jose A. Calvo, Assistant Director
for Region I Reactors
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
Request for Discretionary
Enforcement.

cc w/enclosure:
See next page