



**Duquesne Light**

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December 28, 1981

Director of Nuclear Reactor Regulation  
United States Nuclear Regulatory Commission  
Attn: Mr. Steven A. Varga, Chief  
Operating Reactors Branch No. 1  
Division of Licensing  
Washington, DC 20555



Reference: Beaver Valley Power Station, Unit No. 1  
Docket No. 50-334, License No. DPR-66  
NUREG 0737 Item III.D.3.4 Control Room Habitability

Gentlemen:

In our January 1, 1981 response to the subject document, we had indicated modifications would be required to the Control Room Ventilation System to comply with Regulatory Guide 1.78, 1.95, and General Design Criterion 19 of Appendix "A", 10 CFR 50. The modifications specified were the addition of mass spectrometers and a revised air intake to be completed during July 1983.

Since that time, an intensive engineering review has been performed to identify which toxic gasses would require monitoring and fully define the extent of the changes required within this system. This study has been completed and is submitted herewith as an attachment. The analysis concludes that the only chemical requiring monitoring is chlorine. The aggregate probability of all other toxic gas releases that would result in exposures greater than 10 CFR 100 guidelines was found to be lower than the design basis probability identified in the Standard Review Plan, Section 2.2.3.

We have, therefore, concluded in consideration of existing system design with respect to radiation and chlorine monitoring, emergency breathing air supplies for control room operators, automatic isolation during a DBA and the attached report that the aforementioned changes will not be required. We feel that reasonable, qualitative positions have been established and do not justify or warrant modifications that extend beyond those installed due to past review efforts by your staff.

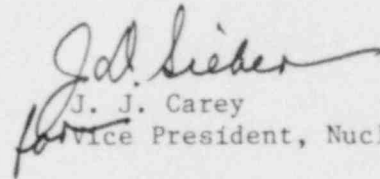
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Contigent upon the acceptance of our position by your staff, we will pursue establishing firm communications links with local industry and enforcement officials such that our facility will receive priority notification during any spill or gas release and Control Room Ventilation isolation can be effected immediately. It is our firm belief that co-ordination procedures such as this, will enhance the overall safety of all site personnel beyond the capability of any gas monitoring equipment. In addition, we will provide periodic checks to assure as that these communication procedures remain in tact over the life of the facility.

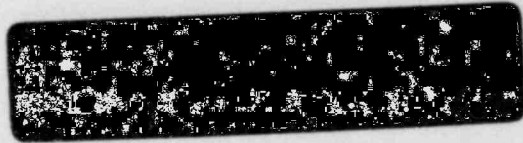
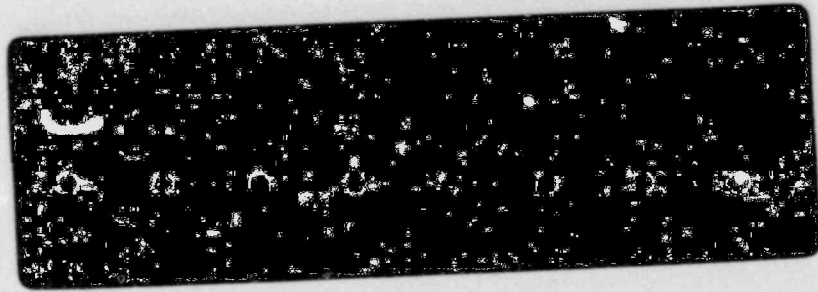
Very truly yours,

  
J. J. Carey  
Vice President, Nuclear

Attachment

cc: Mr. D. A. Beckman, Resident Inspector  
U. S. Nuclear Regulatory Commission  
Beaver Valley Power Station  
Shippingport, PA 15077

U. S. Nuclear Regulatory Commission  
c/o Document Management Branch  
Washington, DC 20555



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