



Duquesne Light

Nuclear Division
P.O. Box 4
Shippingport, PA 15077-0004

Telephone (412) 456-6000

September 29, 1982

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
Technical Specification Amendments 52 and 57 -
Rod Position Indication System

Gentlemen:

During the meeting held in Bethesda, Maryland on July 13, 1982, Duquesne Light Company and Westinghouse Electric Corporation committed to providing your staff a submittal by September 30, 1982 based upon the information presented at that meeting relative to the Analog Rod Position Indication System. This was documented in your letter dated July 20, 1982.

The attachment to this letter represents a summary of the Duquesne Light Company efforts in this regard. Westinghouse cannot meet the original schedule and we have been in contact with their Control and Protection System personnel who have advised us the Westinghouse companion report is expected to be forwarded by mid-October.

Following your review of the two reports, we would like to discuss provisions for a final Technical Specification change on this issue that would ultimately be geared toward achievement of the following:

1. Deleting Technical Specification 3.1.3.3. We have stated that the accuracy requirements for this system at operating temperatures is already established by Specifications 3.1.3.1 and 3.1.3.2. Since the surveillance requirements of these specifications is used to meet the Limiting Condition for Operation of 3.1.3.1 and it is not applicable below 547F, there is no safety significance associated with removing this specification. We believe the "Action" requirements are not conservative and could only serve to remove additional shutdown reactivity for mitigating dilution-type accidents.

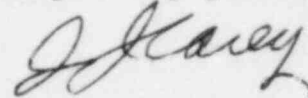
A001

8210050165 820929
PDR ADDCK 05000334
P PDR

2. Eliminate reporting of analog rod position indicators unless the malfunction was due to or caused an actual rod misalignment. We feel that the NRC and Duquesne Light Company staffs are overburdened with the review and processing of Licensee Event Reports that have no significant safety impact. We believe that the reporting requirements for failures not associated with actual misalignments can be incorporated into the Monthly Operating Report. Verifying rod position(s) by checking primary detector voltage is a technically acceptable method for determining rod position.
3. Removing reporting requirements for the inoperability of the automatic rod position deviation monitor. If the rod positions are being verified within the ± 12 step limit every four hours, operability of this monitor should not be required or reportable. Otherwise, scheduled outages or periodic failures of the Main Computer will become reportable events.

We trust this information will satisfy your technical concerns with the Analog Rod Position Indication System. We will provide the Westinghouse report as soon as it is received onsite.

Very truly yours,



J. J. Carey
Vice President - Nuclear

Attachment

cc: Mr. W. M. Troskoski, Resident Inspector
United States Nuclear Regulatory Commission
Beaver Valley Power Station
Shippingport, PA 15077

United States Nuclear Regulatory Commission
c/o Document Management Branch
Washington, DC 20555