

# Duquesne Light Company

Beaver Valley Power Station  
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Vice President - Nuclear Group

October 9, 1990

14121-0016256

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

Reference: Beaver Valley Power Station, Unit No. 2  
Docket No. 50-412, License No. NPF-73  
Proposed Operating License Change Request No. 46  
(TAC No. 77726)

Gentlemen:

Enclosed are:

1. An application for amendment to the above license to revise the Containment Structural Integrity Surveillance Specification 4.6.1.6.1 to add the wording contained in the Standard Technical Specifications.
2. Documents designated Attachments A, B and C which set forth the change in the Technical Specifications, the safety analysis, including the no significant hazards evaluation, and the typed replacement Technical Specification pages.

On October 1, 1990, we submitted Proposed Operating License Change Request No. 181/45 (TAC Nos. 77638 and 77639) and requested expedited action due to the exigent circumstances that exist to support restart from our second refueling outage. During a conference call on Friday, October 5, 1990, we were advised that this proposed change could not be approved in time to support the scheduled entry into Mode 4 for Unit No. 2 following this refueling outage. An alternative plan was developed which would support our refueling activities.

The attached proposed Technical Specification Change is a result of that conference call. This change is applicable to Unit No. 2 only and consists of the addition of the Standard Technical Specification wording to the existing surveillance requirements of specification 4.6.1.6.1. This additional wording is intended to provide an alternate means of performing inspections of the containment vessel surfaces (ie: liner plate and concrete) prior to conducting the Type A containment leakage rate test to verify no apparent changes in appearance or other abnormal degradation.

We request that this proposed change be handled as an emergency Technical Specification Change in accordance with 10 CFR 50.91(a)(5). Our present schedule for conducting our Type A test is to begin testing on October 26, 1990. Based on the conference call, we were advised that this proposed change would have to be approved by the NRC prior to starting the Type A test, therefore, it is necessary that the change be handled as an emergency change. The following represents background information supporting this proposed change.

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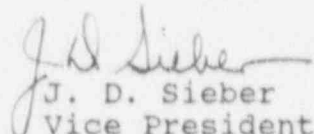
During the inspection of the containment liner, it was observed that a number of containment liner test channel vent plugs were missing. Our first indication of missing vent plugs occurred on approximately September 17, 1990, as we performed the required inspections which precede our Type A containment leakage rate test.

The existing Technical Specifications would require that we remove the test channels associated with the missing vent plugs. The number of missing vent plugs has resulted in an estimated 1500 feet of test channel which would have to be removed in order to satisfy the Technical Specifications. We have identified 25 missing vent plugs, 13 of which are associated with test channels on the liner floor and covered with two feet of reinforced concrete. It is more prudent from a radiological perspective and from a technical perspective to justify leaving the test channel intact and request a change to the Technical Specifications. The information presented in the attachments provides our technical basis for leaving the test channels installed. This Type A test is the first performed following commercial operation and as such is the first scheduled containment liner inspection since pre-op testing where we could have discovered the missing vent plugs.

Several activities have been completed to assess the containment liner condition under the test channels where the vent plugs were identified as missing. A boroscope inspection was performed to examine the liner weld at several locations. Additionally, water samples were extracted from two channels found to be holding water. Chemical analyses of these samples have provided confidence that the actual corrosion rate within the test channels has not exceeded that predicted. Further information regarding these inspections may be found in Attachment B.

It is requested that the NRC approve this proposed change by October 26, 1990 to support our current outage schedule for conducting our Type A containment leak rate test.

Sincerely,

  
J. D. Sieber  
Vice President  
Nuclear Group

cc: Mr. J. Beall, Sr. Resident Inspector  
Mr. T. T. Martin, NRC Region I Administrator  
Mr. A. W. DeAgazio, Project Manager  
Mr. R. Saunders (VEPCO)