Duquesne Light

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April 18, 1983

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
Appendix R to 10 CFR 50

Gentlemen:

Duquesne Light Company's Fire Protection Appendix R Review Report was submitted June 30, 1982. As part of the associated circuit analysis review, Section 5.2.1.3 of the Report stated that we would fuse the secondary side of each control power transformer (CPT) in our 480 volt Emergency Motor Control Centers (MCC's) to preclude a possible ignition source from a secondary short circuit. Upon further investigation, DLC has decided to replace the existing CPT's with new CPT's of an encapsulated design which does not have an ignition potential. We believe this method is better than adding fuses for the following reasons:

1. Introducing fuses into the circuit would have added another device into the system which is susceptible to possible failure and, if inadvertant failure occurred, would disable the control function.

2. The new CPT's of the encapsulated type are readily available, meet IEEE 323 environmental qualifications, and would not have the ignition potential from a secondary short circuit.

3. If fuses were to be used, they would require environmentally qualified fuse holders which are not readily available.

Therefore, this change does not affect our intent to comply with respect to associated circuits as defined in 10 CFR 50, Appendix R, Section III.G.2, and clarified by Generic Letter 81-12. The schedule for change-out of the CPT's in the 480V Emergency MCC's is during our third refueling outage, which is tentatively scheduled for June, 1983.

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We had documented in our October 28, 1982 letter, a description of our alternate shutdown procedures which were revised based on our discussions with your review staff on October 14, 1982. The original draft procedures, which were documented in Chapter 7 of our Appendix R submittal report, were determined to be "repair procedures" and unsatisfactory for achieving and maintaining hot shutdown conditions since they involved lifting leads, installing jumpers and/or removing inaccessible fuses. Our letter of December 10, 1982 documented our intention to finalize the alternate shutdown procedures in conjuntion with the installation of our proposed Backup Indicating Panel (BIP) since it is an integral part of the procedures. The schedule for the BIP, which is defined as equipment required to provide "dedicated shutdown capability" per 10 CFR 50.48, is 30 months from NRC approval date (i.e., July, 1985 and in conjuction with an extended outage to perform required loop tie-in's, testing, etc.).

As a result of the new alternate shutdown procedure, additional areas of the plant will be utilized to achieve safe shutdown, therefore, emergency lighting (per Section III.J) will be required for these areas:

1. East Cable Vault (CV-2) and adjacent stairwell (S-2); Elev. 735. This is the area where the Backup Indicating Panel will be located.

2. Main Steam Valve Room and the access route through stairwell (S-2) and the Motor Control Center Room (Elev. 756). This is the area where the Operator will manually control steam pressure and steam generator level at the Residual Heat Release Valve (HCV-MS-104) and observe the local steam header pressure indication.

3. Main Feedwater Regulating Valve Room area (Elev. 762, Service Bldg.). Access will be via stairwell (S-2) up to Elev. 767, out the exit door onto the rooftop, traversing the PCA shop rooftop to the door leading to the Feedwater Regulating Valve Room. The rooftop area has sufficient lighting via the security perimeter lighting (security diesel power backup). The bypass valves around the Main Feedwater Regulating Valves in this area will be manually operated for feedwater operation.

Since the additional emergency lighting units would be required in conjunction with the alternate shutdown procedures, the schedule for implementation will be consistent with the proposed BIP and the procedures.

Please contact us if additional information or clarification is necessary.

Very truly yours,

J. J. Carey

J. J. Carey
Vice President, Nuclear

Enclosures

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