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February 1, 1984

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  
Class 3 Pipe Support Relief Request

Gentlemen:

Enclosed are:

- 1) Three (3) originals and thirty-seven (37) copies of an application requesting relief from the inservice inspection visual examination requirements of IWD-2600(c) for five (5) Class 3 pipe supports.
- 2) Forty (40) copies of Attachment A which sets forth a discussion of the relief request, the code requirement, a basis for requesting relief and attached figures to identify the relative location of the pipe supports.

In lieu of the visual examination requirements of IWD-2600(c) for the five (5) Class 3 pipe supports, we are proposing the following alternative examination requirement:

1. Perform a best effort visual examination utilizing the appropriate visual aids to improve the inspectability to the greatest extent possible. This best effort examination shall be done to detect any loss of support capability, and evidence of inadequate restraint.

We have determined this to be a Class III request and a check for \$4,000.00 will be submitted under separate cover in accordance with 10 CFR 170.22.

Very truly yours,

*J. J. Carey*  
J. J. Carey  
Vice President, Nuclear

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cc: Mr. Thomas M. Gerusky, Director  
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Pennsylvania Dept. of Environmental Resources  
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Mr. W. M. Trostoski, Resident Inspector  
U. S. Nuclear Regulatory Commission  
Beaver Valley Power Station  
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U. S. Nuclear Regulatory Commission  
c/o Document Management Branch  
Washington, DC 20555

Director, Safety Evaluation & Control  
Virginia Electric & Power Company  
P.O. Box 26666  
One James River Plaza  
Richmond, VA 23261



## ATTACHMENT A

### Class 3 Piping Support Relief Request

Request relief from the visual examination of five (5) Class 3 piping supports (IWD-2600[c]) identified in the basis for requesting relief.

#### Code Requirement

Supports (restraints) and hangers for components exceeding four inches nominal pipe size whose structural integrity is relied upon to withstand design loads when the system function is required shall be visually examined to detect any loss of support capability, and evidence of inadequate restraint.

#### Basis of Requesting Relief

The following supports shown on Figure 13 are located at the bottom of the pipe trench outside the Fuel Handling Building and are inaccessible for visual examination due to the large amount of small bore piping which precludes access into the pipe trench and severely limits the visibility of these supports:

WR-R-153 (H-153)

WR-R-154 (H-154)

WR-R-155 (H-155)

Supports FC-R-8A (H-8A) and FC-R-57 (H-57) shown on Figure 34 are located underwater in the fuel pool and therefore, inaccessible for the code visual examination required.

#### Suggested Alternative Examination Requirements

The following examination is being suggested for all five (5) supports listed above. Perform a best effort visual examination utilizing the appropriate visual aids to improve the inspectability to the greatest extent possible. This best effort examination shall be done to detect any loss of support capability, and evidence of inadequate restraint.

# RIVER WATER

(Fuel Pool B/g.)

REF. DWG'S  
S.W.F. 150-151 / 229  
RM 21B / 31A

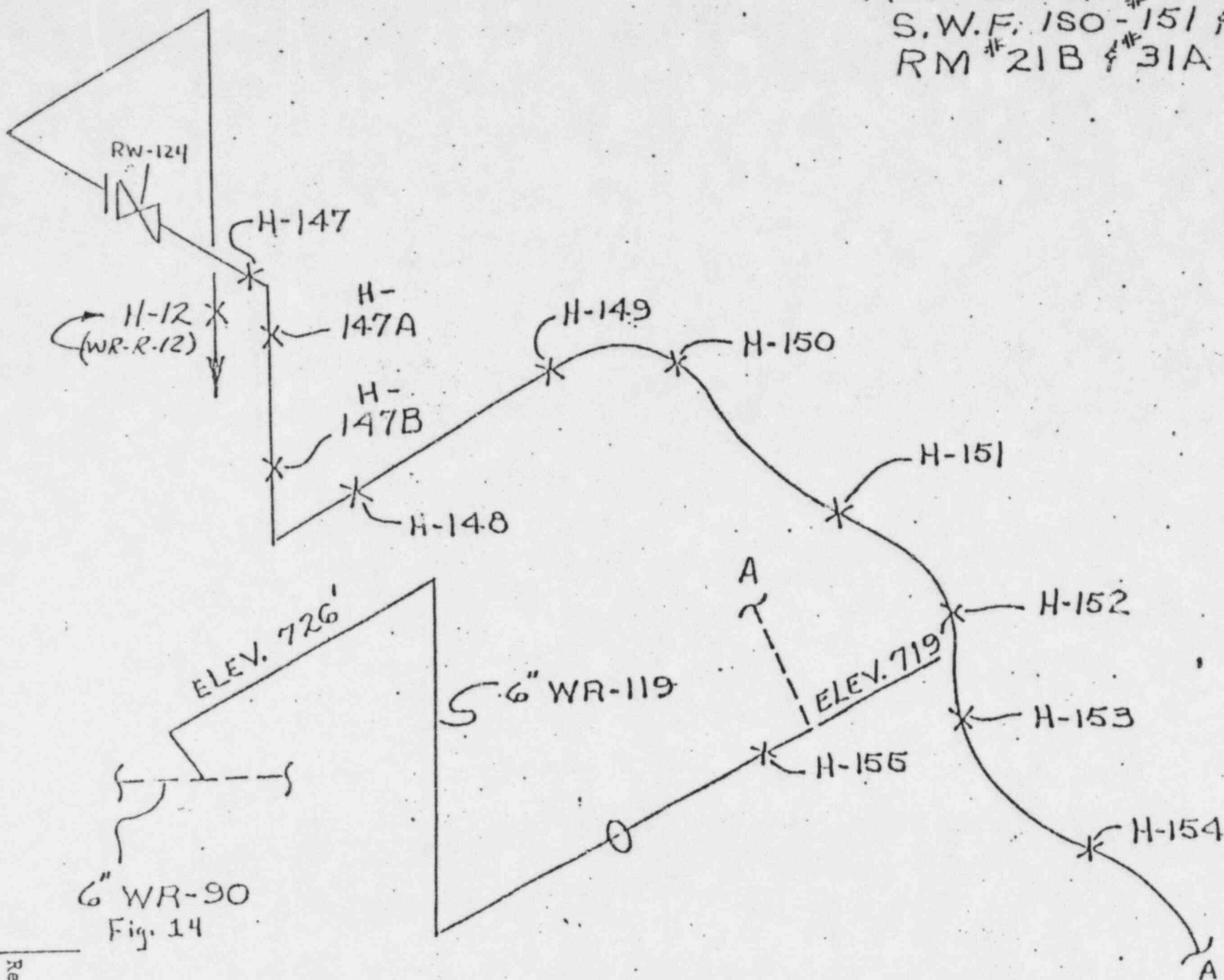


FIGURE 13

# 6" SPENT FUEL POOL COOLING

REF DWG'S  
S.W.F. 150 70  
S. & W. RM 31A

