



# Duquesne Light

Nuclear Construction Division  
Robinson Plaza, Building 2, Suite 210  
Pittsburgh, PA 15205

2NRC-4-076  
(412) 787-5141  
(412) 923-1960  
Telecopy (412) 787-2629  
June 8, 1984

United States Nuclear Regulatory Commission  
Washington, DC 20555

ATTENTION: Mr. George W. Knighton, Chief  
Licensing Branch 3  
Office of Nuclear Reactor Regulation

SUBJECT: Beaver Valley Power Station - Unit No. 2  
Docket No. 50-412  
Response to Instrumentation and Control Licensing Positions

Gentlemen:

Your letter of May 8, 1984, to Mr. E. J. Woolever transmitted instrumentation and control licensing positions (Nos. 1 and 2) for Beaver Valley Power Station Unit 2. The responses to these positions are provided in Attachments 1 and 2.

DUQUESNE LIGHT COMPANY

By E. J. Woolever  
E. J. Woolever  
Vice President

KAT/wjs  
Attachments

cc: Mr. H. R. Denton (w/attachments)  
Mr. D. G. Eisenhut, Director (w/attachments)  
Ms. M. Ley, Project Manager (w/attachments)  
Mr. G. Walton, NRC Resident Inspector (w/attachments)  
Mr. M. Licitra, Project Manager (w/attachments)

SUBSCRIBED AND SWORN TO BEFORE ME THIS  
8th DAY OF June, 1984.

Anita Elaine Reiter  
Notary Public  
ANITA ELAINE REITER, NOTARY PUBLIC  
ROBINSON TOWNSHIP, ALLEGHENY COUNTY  
MY COMMISSION EXPIRES OCTOBER 20, 1986

8406140009 840608  
PDR ADOCK 05000412  
A PDR

Boo!  
11



## ATTACHMENT 1

### Response to ICSB Licensing Position No. 1 on Steam Generator Level Control

The staff position on this issue states that ". . . either the design of the feedwater isolation on a high steam generator level be modified to meet the requirements of paragraph 4.7 of IEEE-STD-279 or an analysis . . . be provided to show that the consequences of feedwater addition not being terminated by the high steam generator level signal are not safety significant." Duquesne Light Company understands this requirement to be a backfit as stated in letter 2NRC-4-068 of May 30, 1984. Despite this, however, plant specific analysis had been performed to address any possible concern that may have been raised by the staff position. A copy of the analysis report follows this position. This analysis has shown that the consequences of excessive feedwater addition are not safety significant because, even if such an event should occur, sufficient time is available for the operator to take appropriate action. Therefore, the current steam generator level system design is adequate.