



# Duquesne Light

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June 25, 1984

United States Nuclear Regulatory Commission  
Washington, DC 20555

ATTENTION: Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation

SUBJECT: Beaver Valley Power Station - Unit No. 2  
Docket No. 50-412  
Identification of Backfit Requirement Number 2

Gentlemen:

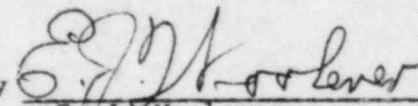
In a letter to Duquesne Light Company (DLC) dated September 19, 1983, the NRC transmitted the Power Systems Branch, Mechanical Section questions resulting from review of the Beaver Valley Power Station Unit 2 (BVPS-2) FSAR. Question 430.119, which was attached to that letter, cited SRP 9.5.7 and directed DLC to "provide a low level alarm for the rocker arm lube oil resevoir" on the emergency diesel generators.

SRP 9.5.7 indicates that the reviewer may select and emphasize material from this SRP section as may be appropriate for a particular case and includes the review of P&ID's for temperature, pressure, and level sensors which alert the operator when these parameters exceed the ranges recommended by the engine manufacturer. The acceptance criteria section of the SRP, while not providing any specific criteria for this item, states, "an additional basis for the acceptability of the system will be the degree of similarity with systems in previously reviewed plants with satisfactory operating experience."

Since the BVPS-2 design incorporates a low pressure alarm which would result in similar operator action and since this is a standard design of the engine manufacturer which has been accepted by the NRC for many plants now in operation, the requirement that DLC install a low level alarm is a new interpretation of the SRP and the controls of 10CFR50.109, GNL 84-08, and NRC Manual Chapter 0514 identify the requirement as a backfit.

DLC requests that the proposed requirement be submitted to NRC management for approval, in accordance with the Office of Nuclear Reactor Regulation (NRR) procedure for management of plant specific backfitting, prior to transmittal as a licensing requirement.

DUQUESNE LIGHT COMPANY

By   
E. J. Woolever  
Vice President

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cc: Mr. H. R. Denton  
Mr. G. W. Knighton, Chief  
Ms. M. Ley, Project Manager  
Mr. E. A. Licitra, Project Manager  
Mr. G. Walton, NRC Resident Inspector