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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 Open Item Response

Gentlemen:

This letter forwards responses to the issues listed below. The following items are attached:

- Attachment 1: Additional Information on Outstanding Issue 68 of the Beaver Valley Power Station Unit No. 2 Draft Safety Evaluation Report
- Attachment 2: Additional Information on Outstanding Issue 71 of the Beaver Valley Power Station Unit No. 2 Draft Safety Evaluation Report

DUQUESNE LIGHT COMPANY

Woolever

Vice President

KAT/wjs Attachments

cc: Mr. H. R. Denton, Director NRR (w/a)
Mr. D. Eisenhut, Director Division of Licensing (w/a)
Mr. G. Walton, NRC Resident Inspector (w/a)

- Mr. E. A. Licitra, Project Manager (w/a)
- Ms. M. Ley, Project Manager (w/a)

SUBSCRIBED AND SWORN TO, BEFORE ME THIS Itth DAY OF actales, 1984. ecta

Notary Public

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ANITA ELAINE REITER, NOTARY PUBLIC ROBINSON TOWNSHIP, ALLEGHENY COUNTY MY COMMISSION EXPIRES OCTOBER 20, 1986

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COMMONWEALTH OF PENNSYLVANIA ) ) COUNTY OF ALLEGHENY )

SS:

On this <u>144</u> day of <u>Vetoku</u>, <u>1989</u>, before me, a Notary Public in and for said Commonwealth and County, personally appeared E. J. Woolever, who being duly sworn, deposed and said that (1) he is Vice President of Duquesne Light, (2) he is duly authorized to execute and file the foregoing Submittal on behalf of said Company, and (3) the statements set forth in the Submittal are true and correct to the best of his knowledge.

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ANITA ELAINE REITER, NOTARY PUBLIC ROBINSON TOWNSHIP, ALLEGHENY COUNTY MY COMMISSION EXPIRES OCTOBER 20, 1986

## ATTACHMENT 1

## Additional Information on Outstanding Issue 68 of the Beaver Valley Power Station Unit No. 2 Draft Safety Evaluation Report

During the June 29, 1984, meeting with the NRC, the NRC reviewer questioned the seismic qualification of the indicators on the emergency shutdown panel (ESP). The following is provided in response to this question.

The ESP is designed to meet the requirements of GDC 19. The indicators on the ESP are manufactured by the same vendor and are the same model (VX252) as those used on the main control board. The indicators on the main control board are seismically qualified. The ESP indicators, however, were not purchased as seismic instruments, as the seismic event is not considered when operation from the ESP is required. Because the ESP instrumentation was not purchased as seismic instrumentation, no documentation exists to document its ability to withstand a seismic event. However, the similarity between this instrumentation and that on the main control board (same manufacturer and model) implies that the ESP instrumentation would remain functional through a seismic event.

## ATTACHMENT 2

## Additional Information on Outstanding Issue 71 of the Beaver Valley Power Station Unit No. 2 Draft Safety Evaluation Report

During the June 29, 1984, meeting with the NRC, Duquesne Light Company (DLC) agreed to review the implementation of Regulatory Guide (R.G.) 1.47 with respect to the "support system" and "protection system" interrelationships. DLC has reviewed this and understands that if a safety system directly depends on a support system, then the safety system should indicate that it is inoperable any time the support system is inoperable. This should be so indicated even if the support system is separatly indicated. This is the position advocated by the NRC reviewer.

Therefore, DLC will make the following changes to the Bypassed and Inoperable Systems Indication (BISI) logic which follow from this philosophy.

- 1. Inoperability of containment component cooling water will cause residual heat removal to indicate inoperable.
- 2. Inoperability of service water will cause component cooling, diesel generator, and recirculation spray to indicate inoperable.