



Duquesne Light

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August 1, 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
Generic Letter 82-33
"Safety Parameter Display System Safety Analysis Report and
Implementation Plan Report"

Gentlemen:

In accordance with Beaver Valley Power Station Unit 2's (BVPS-2) submittal, Reference (a) in response to Reference (b), BVPS-2 is providing the "Safety Analysis Report and Implementation Plan for the Safety Parameter Display System (SPDS)." This safety analysis is the basis upon which the parameters were selected for display on the SPDS.

The following is the documentation that describes the generic Westinghouse Plant Safety Status Display System (PSSD) analysis:

1. WCAP-10170, "Emergency Response Facilities Design and V&V Process," April 29, 1982
2. WCAP- 0170, Appendices A, B, C, and D, E. P. Rahe to W. A. Paulson, January 26, 1983
 - ° Appendix A, "Introduction"
 - ° Appendix B, "SPDS Development Process"
 - ° Appendix C, "Key Safety Parameter Selection"
 - ° Appendix D, "Bibliography"
3. ESD-CR&CD-105, "Design Basis Document - Plant Safety Status Display, Revision 1," July 18, 1980
4. LS05-84-02-009, "Review of Westinghouse Generic Safety Parameter Display System," Dennis M. Crutchfield to E. P. Rahe, February 2, 1984

The following areas listed below are discussed in the above documents but are not applicable to the BVPS-2 SPDS. These include the following:

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1. The terminology used by BVPS-2 is SPDS in lieu of the Westinghouse nomenclature of PSSD.
2. BVPS-2 is implementing the Westinghouse PSSD software on non-Westinghouse supplied hardware. Hence, any hardware implementation discussions in the above reports are not applicable to the BVPS-2 SPDS design.
3. Since BVPS-2 is programing the Westinghouse PSSD software on non-Westinghouse supplied hardware, the hardware portion of the functional requirements discussed in the above documents is not applicable to the BVPS-2 SPDS.
4. The BVPS-2 SPDS design does not include a Bypass and Inoperable Status Indication (BISI). Hence, any discussion pertaining to the BISI system is not applicable.
5. Any discussion in the above documents pertaining to the Onsite Technical Support Center (OTSC) is not applicable to the BVPS-2 SPDS design.
6. The Verification and Validation (V&V) Process discussed in the above reports is not applicable to the BVPS-2 SPDS design.

The following is BVPS-2's position regarding the above six areas that are not applicable to BVPS-2 in the references that describe the generic Westinghouse Plant Safety Status analysis:

1. DLC/BVPS-2 is using the term "SPDS" not "PSSD."
2. Hardware description is contained in specification 2BVS-738 and in applicable drawings/listings and documents in the 2BVS-738 file.
3. Hardware implementation of functional requirements is also described in 2BVS-738.
4. BISI system is implemented in the plant computer system and is described in Section 7 of the FSAR.
5. The OTSC is not a part of the licensing submittal for the SPDS.
6. V&V results will be available for NRC audit during Post-Implementation Review. DLC is requesting a post-implementation review of BVPS-2's SPDS by the NRC three months prior to fuel load versus the scheduled post implementation review per Reference (a). This is due to the recent six-month delay notification for commercial operation for BVPS-2.

The BVPS-2 plant specific list of key safety parameters to be displayed on the BVPS-2 SPDS is provided in WCAP-10170, Appendix C-S1,

Revision 1, "Key Safety Parameter Selection for the Beaver Valley Unit 2 Safety Parameter Display System (SPDS)," July, 1984 (Attachment 1).

As WCAP-10170, Appendix C-S1, Revision 1, contains information proprietary to Westinghouse Electric Corporation, it is supported by an affidavit signed by Westinghouse, the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in Paragraph (B)(4) of Section 2.790 of the Commission's regulations.

Accordingly, it is respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10CFR Section 2.790 of the Commission's regulations. Correspondence with respect to the proprietary aspects of the application for withholding or the supporting Westinghouse affidavit should reference AW-89-9, and should be addressed to R. A. Wiesemann, Manager, Regulatory and Legislative Affairs, Westinghouse Electric Corporation, P.O. Box 355, Pittsburgh, PA 15230.

In summary, the referenced documents, with the noted exceptions, document the safety analysis performed in establishing a basis upon which the parameters were selected for display on the BVPS-2 SPDS. In addition to fulfilling BVPS-2's commitments in Reference (a), this submittal closes Outstanding Issue No. 114 of BVPS-2's Draft SER.

DUQUESNE LIGHT COMPANY

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

SDH/wjs
Attachment

cc: Mr. G. W. Knighton, Chief (w/a)
Ms. M. Ley, Project Manager (w/a)
Mr. E. A. Licitra, Project Manager (w/a)
Mr. G. Walton, NRC Resident Inspector (w/a)
NRC Document Control Desk (w/a)

REFERENCES: (a) 2NRC-3-017, dated 4/15/83
(b) Generic Letter 82-33, "Supplement 1 to NUREG-0737," dated 12/17/82

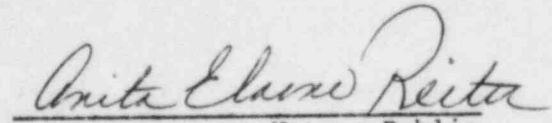
SUBSCRIBED AND SWORN TO BEFORE ME THIS
1st DAY OF August, 1984.

Anita Elaine Reiter
Notary Public

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

COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF ALLEGHENY)

On this 1st day of August, 1984, 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.


Notary Public

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