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Docket No. 50-334
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Mr. J. D. Sieber, Vice President
Nuclear Group
Duquesne Light Company
Post Office Box 4
Shippingport, Pennsylvania 15077-0004

Dear Mr. Sieber:

SUBJECT: INSTRUMENTATION TO FOLLOW THE COURSE OF AN ACCIDENT - REGULATORY
GUIDE 1.97 (TAC NO. M75944)

Section 6.2 of Generic Letter 82-33 requested licensees to provide a report on their implementation of Regulatory Guide 1.97 (Revision 2), including methods for complying with the Commission's regulations and supporting technical justification for any proposed alternatives or deviations. A large number of exception requests were received from PWR licensees asking that the environmental qualification requirement for accumulator level and pressure monitoring instrumentation be relaxed from Category 2 to Category 3. This change would allow the use of commercial grade instruments. Prior to 1987, these requests were denied by the staff, but since then, these exception requests have been considered as open items pending generic resolution.

The staff has reviewed the bases for these exceptions and has concluded that no operator action is based on this post-accident instrumentation and that it does not perform a safety function. Furthermore, successful performance of core cooling systems can be inferred from other environmentally qualified instrumentation. Since this instrumentation does not perform any post-accident safety function, its qualification requirements can be reduced to Category 3. A copy of the Safety Evaluation is enclosed.

Sincerely,

/s/

Albert W. De Agazio, Sr. Project Manager
Project Directorate I-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
Safety Evaluation

cc w/enclosure:
See next page

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Mr. J. D. Sieber
Duquesne Light Company

Beaver Valley Power Station
Units 1 & 2

cc:

Jay E. Silberg, Esquire
Shaw, Pittman, Potts & Trowbridge
2300 N Street, NW.
Washington, DC 20037

Nelson Tonet, Manager
Nuclear Safety
Duquesne Light Company
Post Office Box 4
Shippingport, Pennsylvania 15077

Commissioner Roy M. Smith
West Virginia Department of Labor
Building 3, Room 319
Capitol Complex
Charleston, West Virginia 25305

John D. Borrows
Director, Utilities Department
Public Utilities Commission
180 East Broad Street
Columbus, Ohio 43266-0573

Director, Pennsylvania Emergency
Management Agency
Post Office Box 3321
Harrisburg, Pennsylvania 17105-3321

Bureau of Radiation Protection
Pennsylvania Department of
Environmental Resources
ATTN: R. Janati
Post Office Box 2063
Harrisburg, Pennsylvania 17120

Mayor of the Borough of
Shippingport
Post Office Box 3
Shippingport, Pennsylvania 15077

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19406

Resident Inspector
U.S. Nuclear Regulatory Commission
Post Office Box 181
Shippingport, Pennsylvania 15077