

December 12, 1984

Docket No. 50-334

Mr. J. J. Carey, Vice President
Nuclear Group
Duquesne Light Company
Post Office Box 4
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Dear Mr. Carey:

SUBJECT: TECHNICAL SPECIFICATIONS FOR LEAK TESTING OF PURGE/VENT VALVES AT
BEAVER VALLEY, UNIT 1 (TAC 55423)

References:

- (1) Letter from Steven A. Varga (NRC) to J. J. Carey (DLC)
dated July 15, 1981
- (2) Letter from J. J. Carey (DLC) to Steven A. Varga (NRC)
dated August 27, 1981
- (3) Letter from J. J. Carey (DLC) to Steven A. Varga (NRC)
dated December 23, 1981
- (4) Letter from J. J. Carey (DLC) to Steven A. Varga (NRC)
dated April 6, 1982

In our letter dated July 15, 1981 (Reference 1), which resulted from Multi-Plant Action B-24, we requested that DLC propose Technical Specifications which would require leakage integrity tests of the isolation valves in the containment purge lines at intervals not to exceed six months. At that time, the only leak tests of the valves being done were the tests required by Appendix J of 10 CFR 50. Appendix J requires, in part, that the Type C test be performed during each reactor shutdown for refueling, but in no case at intervals greater than 2 years.

In References 2, 3, and 4, you presented arguments for simply continuing the Type C tests and not implementing the six-month leakage tests for the following reasons:

- (1) BV1 has a subatmospheric containment, and hence its Technical Specifications do not permit reactor operation with any of the containment purge line isolation valves open. Containment pressure is monitored continuously so that any gross leaks through the valves would be detected immediately. The Technical Specifications require that the integrated containment leakage rate be computed and logged each shift.

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- (2) The containment vacuum pumps have a capacity of about 5 scf/min. Continuous operation of the vacuum pumps would be required to maintain the containment vacuum if there were excessive leakage from any source. This would alert the control room operator that there may be some degradation of the valve seals.
- (3) The valves are not subject to harsh environmental conditions and are not exercised during reactor operation. Reference 4 presents data which show that no detectable valve seal degradation has taken place between Type C tests. Fisher Controls, the vendor for the valves, has presented data (Reference 3) which demonstrate that the valve seals will not suffer detectable radiation damage under any anticipated exposure. This makes it extremely unlikely that a valve seal would suffer appreciable degradation between the Type C tests.

From the above arguments, we find that your position is reasonable and your request to waive the six-month leakage test requirement acceptable, since the current Technical Specifications fulfill the intent of the six-month test.

This completes our action on the subject matter. If you have any question, please feel free to contact your project manager, Mr. Peter Tani.

Sincerely,

/s/SAVarga

Steven A. Varga, Chief
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cc:
See next page

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C-ORBY1:DL
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