

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

FEB 1 5 1985

Docket No. 50-412

MEMORANDUM FOR:

Harold Denton, Director

Office of Nuclear Reactor Regulation

FROM:

James P. Knight, Acting Director

Division of Engineering

SUBJECT:

TECHNICAL SPECIFICATION FOR PRESSURE ISOLATION

VALVES AT BEAVER VALLEY UNIT 2

Current instructions to the staff regarding second plant technical specifications at two unit sites is that the technical specifications should be the same as those of the first unit (Office Letter No. 38 Supplement). However, the Beaver Valley 1 technical specifications for pressure isolation valves do not reflect post TMI-2 staff concerns about intersystem LOCA events both inside and outside containment as now written, and should, therefore, not be extended to Beaver Valley 2. Specifically, the list of pressure isolation valves for Beaver Valley Unit 1 only covers the "Event V" valves and not all pressure isolation valves as has been done for all plants licensed since the TMI-2 accident. Only six valves of a total of about 34 pressure isolation valves are currently covered in the Beaver Valley 1 technical specifications.

The purpose of including all pressure isolation valves in the technical specifications is to assure that these valves are subjected to limiting conditions for operation (LCO) and surveillance requirements in order to reduce the potential for a LOCA either inside or outside containment. The "Event V" valve list was based solely on the WASH 1400 study which addressed only a LOCA which bypassed containment. The "Event V" orders, which mandated surveillance and LCO for an abbreviated list of valves, was intended to address only the WASH-1400 dominant accident scenario (Event V). Thereafter, the staff, through its review of IST programs at operating reactors and review of complete pressure isolation valve lists in NTOL technical specifications, has been requiring complete lists of pressure isolation valves in the technical specifications. This is in accordance with requests from the Division of Systems Integration as well as previous agreements between the Division of Engineering and the Division of Licensing.

Accordingly, we request approval to impose the latest standard technical specifications together with the complete list of pressure isolation valves for Beaver Valley 2.

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During the forthcoming review of the Beaver Valley Unit 1 first full 120 month Inservice Testing Program for Pumps and Valves, scheduled for completion in September, 1986, we will recommend to the Division of Licensing that the Unit 1 technical specifications be amended to include all of the pressure isolation valves.

> James P. Knight, Acting Director Division of Engineering

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