



Duquesne Light

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November 8, 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
Identification of Backfit Requirement Number 26

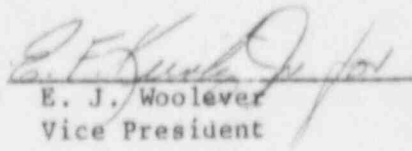
Gentlemen:

In a letter to Duquesne Light Company (DLC) dated September 19, 1983, the NRC transmitted the Power Systems Branch, Mechanical Section questions resulting from review of the Beaver Valley Power Station Unit 2 (BVPS-2) FSAR. Question 430.65 directed DLC to modify BVPS-2 design to assure plant illumination levels in excess of the Illuminating Engineering Society (IES) Lighting Handbook guidelines. In a meeting with Power Systems Branch and the Human Factors Engineering Branch on September 13, 1984, it was agreed that the DLC interpretation of the IES Lighting Handbook was correct, but more restrictive levels are being required by HFEB.

Standard Review Plan (SRP) 9.5.3 states: "...the lighting systems designs will be acceptable if they conform to the Illuminating Engineering Society Lighting Handbook as related to systems design and illumination levels recommended for industrial facilities." This is a new interpretation of the SRP, and the controls of 10CFR50.109, GNL 84-08, and NRC Manual Chapter 0514 identify the requirement as a backfit.

DLC requests that the proposed requirement be submitted to NRC management for approval, in accordance with the Office of Nuclear Reactor Regulation (NRR) procedure for management of plant specific backfitting, prior to transmittal as a licensing requirement. It also appears that this requirement is being imposed on a generic basis and should be brought to the attention of CRGR.

DUQUESNE LIGHT COMPANY

By 
E. J. Woolever
Vice President

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Mr. Darrell G. Eisenhut, Director
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cc: Mr. H. R. Denton, Director (NRR)
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