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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 23

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 430.57 requested a discussion of how communication systems are protected against failures resulting from accidents or fires. The DLC response was rejected. On September 13 and 14, 1984, a meeting was held in which the following outstanding issue which has not been formally provided to DLC was discussed:

"The information submitted by the applicant is insufficient to evaluate the capabilities of the onsite communication systems. In addition to the above, the applicant was requested to evaluate his system and discuss the protective measures taken to assure a functionally operable onsite and offsite communication system. The discussion was to include the considerations given to component failures, loss of power, the severing of communication lines or trunks as a result of an accident or fire, and any sharing with the Unit 1 communication systems and their power sources. His response was inadequate in that the staff cannot determine that the system/component failures will not result in a total loss of communications at BVPS-2.

From information submitted on the intraplant communication system, the staff concludes that under seismic condition with a loss of offsite power all communications within the plant will be lost. This is not acceptable."

Standard Review Plan (SRP) 9.5.2 states: "There are not general design criteria or regulatory guides that directly apply to the safety-related performance requirements for the design and use of the communication system during normal plant operations and transient conditions." Since Power Systems Branch requires that communications systems be designed to meet conditions such as identified in General Design Criterion 2 and General

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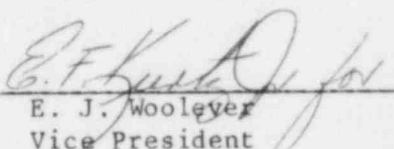
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Design Criterion 4, in contradiction to the SRP and in excess of 10CFR50 Appendix A, this is a new interpretation of the SRP, and the controls of 10CFR50.109, GNLR 84-08, and NRC Manual Chapter 0514 identify the requirement as a backfit.

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. Wooley
Vice President

GLB/nml

cc: Mr. H. R. Denton, Director (NRR)
Mr. G. W. Knighton, Chief
Mr. B. K. Singh, Project Manager
Mr. V. Stello, Jr., DEDROGR
Mr. G. Walton, NRC Resident Inspector