



# Duquesne Light

Nuclear Construction Division  
Robinson Plaza, Building 2, Suite 210  
Pittsburgh, PA 15205

2NRC-4-186

(412) 787-5141

(412) 923-1960

Telecopy (412) 787-2629

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 24

Gentlemen:

On September 13 and 14, 1984, a meeting was held between Duquesne Light Company (DLC) and the Power Systems Branch, Mechanical Section. This meeting was intended to resolve Duquesne Light Company responses to requests for information provided earlier in the review process. At that meeting, the following outstanding issue which has not been formally provided to DLC was discussed:

"...the information submitted by the applicant in Amendment 4 to the FSAR indicates that the communication systems, in particular the page party system, the radio system, the microwave system, and telephone systems are shared, interconnected in some manner or can be connected to their counterpart systems in Beaver Valley Unit 1. From the information submitted, the staff can not determine if the communication systems are designed to meet the requirements of General Design Criterion (GDC) 5."

Standard Review Plan (SRP) 9.5.2 states: "There are no 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 the Power Systems Branch requires that communications systems meet GDC 5, 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 9514 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,

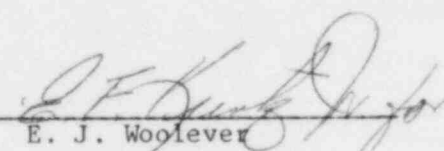
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United States Nuclear Regulatory Commission  
Mr. Darrell G. Eisenhut, Director  
Page 2

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

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