



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 25

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 430.64 requested a discussion of protective measures which assure a functionally operable lighting system under conditions such as accidents and fires. The response provided by DLC was rejected. During a meeting with Power Systems Branch on September 13 and 14, 1984, the following outstanding issue which has not been formally provided to DLC was discussed at that meeting:

"The applicant was requested to provide a discussion on the protection measures taken to assure a functionally operable lighting system, including considerations given to component failures, loss of ac power, and the severing of lighting cables as a result of an accident or fire. He has not adequately responded to this request."

Standard Review Plan (SRP) 9.5.3 states: "There are no general design criteria or regulatory guides that directly apply to the safety-related performance requirements for the lighting system." Since the Power System Branch requires that lighting systems be designed to withstand conditions such as those specified in General Design Criterion 4, which is contrary 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,

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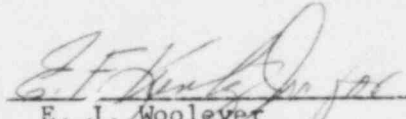
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prior to transmittal as a licensing requirement. It also appears that this requirement is being imposed on a generic basis and should be brought to the attention of CRGR.

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