



# 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 28

Gentlemen:

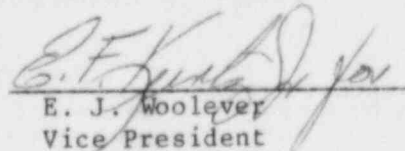
In a letter to Duquesne Light Company (DLC) dated September 19, 1983, the NRC transmitted the Power Systems Branch, Mechanical Section questions resulting from review of the Beaver Valley Power Station Unit 2 (BVPS-2) FSAR. Question 430.74 states, "The engine mounted components and piping and certain other components listed in the various sections of 9.5 and Table 3.2-1 are designed and manufactured to DEMA standards and/or manufacturer's standards and are seismic Category I. This is not in accordance with Regulatory Guide 1.26 which requires the entire diesel generator auxiliary systems be designed to ASME Section III Class 3 or Quality Group C."

Regulatory Guide 1.26 states, "... systems not covered by this guide, such as ... diesel engine and its generators and auxiliary support systems, diesel fuel, ... should be designed, fabricated, erected and tested to quality standards commensurate with the safety function to be performed. In addition, standard review plan Sections 9.5.4 through 9.5.8 which identify review procedures for the various diesel generator auxiliary systems, do not specify Regulatory Guide 1.26 as an acceptance criterion. The Power Systems Branch position is a new interpretation of the SRP and the Regulatory Guide. 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. Woolever  
Vice President

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Mr. Darrell G. Eisenhut, Director  
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Attachment

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