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Docket Nu. 50-412

MEMORANMUMI TO: Gronge W. Krighton, Chief Licensing Branch #3, DL

FRIM: Wan. H. Regan, Jr., Chief Site Analysis Branch, DE

SUBJECT: BEAVER VALLEY UNIT 2 MOBIL OIL PIPELINF

Plant No.: Beaver Valley Unit 2 Docket No.: 50-412 L'censing Stage: OL Responsible Branch: LB #3, L. LBZO, LPM SAB Reviewer: C. Ferreil Requested Completion Date: Review Status: SER Review Continuing

In amendment No. 6 of the Rnever Valley Unit No. 2 FSAR, dated April 27, 1984, the applicant provided a probability analysis of a pipeline rupture for the relocated Mobil Oil Gasoline pipeline. The analysis is based on a pipeline failure rate corresponding to aur mar grade pipes. We do not have any basis for assuming that the fell mate of nuclear powerplant piping is applicable to buried pipeline grad to carry petroleum products. For example, digging activites on to be a principal cause of underground pipeline failures. A relieve rate used by the applicant does not accept for this.

We have requested additional information in the attached questions to determine the failure rate for the type of pipeline actually used for the relocated Hobil OII Company pipeline based on National Transportator Safety Board statistics.

Mm. H. Regan, Jr., Chief Site Analysis Branch Division of Engineering

Enclosure: As stated DE: SAB DE - CFerrell: jaj KCampe - 5/ - /84 517184 5/ 8/84

## Questions

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Section 2.2.3

Amendment No.6 of the Beaver Valley Unit No. 2 FSAR provides a probability analysis of the relocated Mobil Oil gasoline pipeline based on the failure rate of nuclear reactor grade pipes that is referenced on page 2.2-20 of the FSAR.

Since petroleum product pipelines are subjected to different environmental conditions, and are constructed of different materials and to different specifications than reactor grade piping, we do not believe that your use of this probability reference is valid.

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Please provide a pipeline failure analysis based on accident statistics from the National Transportation Board for pipelines of the same materials and methods of welding as was used in the relocated Mobil Oil Company pipeline.