ENCLOSURE 1

JUN 18 1984

MEMORANDUM FOR: Thomas M. Novak, Assistant Director for Licensing
Division of Licensing

FROM: R. Wayne Houston, Assistant Director for Reactor Safety
Division of Systems Integration

SUBJECT: BASIS FOR BEAVER VALLEY 2 FEEDWATER ISOLATION ON HIGH STEAM GENERATOR LEVEL DESIGN REQUIREMENTS

Plant Name:	Beaver Valley 2
Docket No.:	50-412
Licensing Status:	OL
Responsible Branch:	LB#3
Project Manager:	L. Lazo
Review Branch:	ICSB
Review Status:	Incomplete

In Section 7.3.3.12 of the Beaver Valley 2 draft SER, ICSB expressed a concern that the design of feedwater isolation on a high steam generator level did not meet the requirements of paragraph 4.7 of IEEE-STD-279. The applicant's response to that concern, dated March 28, 1984, stated that IEEE-STD-279 is not applicable to the issue.

In response, ICSB stated, in our Licensing Position #1 for Beaver Valley 2 dated April 30, 1984, that either the design of the feedwater isolation on a high steam generator level be modified to meet the requirements of IEEE-STD-279 or an analysis be provided to show that the consequences of feedwater addition not being terminated by the high steam generator level signal are not safety significant. In a May 30, 1984, response, the applicant claims that ICSB's position is a new requirement and should be processed in accordance with NRR procedures for plant specific backfitting.

ICSB has reviewed the applicant's claim and believes that the characterization of this issue as a backfit is inappropriate. As stated in ICSB Licensing Position #1, the applicant, in Chapter 15 of the Beaver Valley 2 FSAR, takes credit for feedwater isolation on a high steam generator level signal and identifies this isolation action as an engineered safety feature actuation function. Consistent with this, the applicant, in Section 7.3 of the FSAR, has identified IEEE-STD-279 as an acceptance criterion for the feedwater isolation function and has further claimed to meet those requirements (specifically including paragraph 4.7 of IEEE-STD-279).

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ICSB's position on this issue is based on our review following the guidance of Sections 7.1 and 7.3 of the NUREG-0800 (SRP) to confirm that the design of the feedwater isolation function satisfies the requirements of the appropriate acceptance criteria. We, therefore, conclude, based on the documentation provided by the applicant's FSAR, that this should not be considered a new requirement (backfit) and we again request that the applicant respond to ICSB Licensing Position #1 on this issue.

Original Signed By
R. Wayne Houston

R. Wayne Houston, Assistant Director
for Reactor Safety,
Division of Systems Integration

cc: R. Mattson
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