

Duquesne Light Company

Beaver Valley Power Station
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September 30, 1998
L-98-192

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

Subject: Beaver Valley Power Station, Unit No. 2
Docket No. 50-412, License No. NPF-73
Reply to SER on Inservice Testing Program (IST)
Ten-Year Update (TAC No. M98909)

By letter dated May 30, 1997, Duquesne Light Company (DLC) submitted an updated IST Program for the second ten-year interval for Beaver Valley Power Station, Unit No. 2 (BVPS-2). Based on NRC review, a Safety Evaluation report (SER) for this submittal was issued on November 18, 1997. This NRC Safety Evaluation identified two anomalies and a response by DLC was requested.

The following is the DLC response to the two identified anomalies:

Anomaly No. 1:

The scope of the IST Program for valves appears to be incomplete. The statement, "pressure relief devices covered are those for protecting systems or portions of systems which perform a required function in shutting down a reactor to the cold shutdown condition, in maintaining the cold shutdown condition, or in mitigating the consequences of an accident," should be included in the IST Program scope as called for in Section 1.1 of OM-10.

Response:

This statement was incorporated into Issue 2, Revision 0C of the BVPS-2 IST Program (copy enclosed) which was implemented on August 14, 1998.

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Anomaly No. 2:

Relief Valves [2FNC*RV101 and 102] appear to be Code Class 2 and to have a safety function for protecting the Fuel Pool Cooling & Purification System. These valves should be included in the IST Program, as necessary, in accordance with Section 1.1 of OM-10.

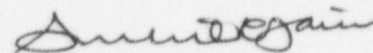
Response:

These relief valves are located in Safety Class 3 piping and provide overpressure protection for the Fuel Pool Cooling Pumps, discharge piping and Heat Exchangers. They, however, have not been included in the BVPS-2 IST Program because there are no postulated accidents associated with failure of the Fuel Pool Cooling System. Redundant means for hookup of temporary pumps and supplemental water supplies have been provided for as stated in UFSAR Section 9.1.3.2. Therefore, these relief valves are not required to function in shutting down a reactor to the cold shutdown condition, in maintaining the cold shutdown condition, or in mitigating the consequences of an accident, and will, therefore, not be included in the BVPS-2 IST Program. (Reference: DLC (J. D. Sieber) letter to the NRC dated June 20, 1988, which provided justification for deletion of the Fuel Pool Cooling Pumps from Issue 1, Revision 2 of the BVPS-2 IST Program.)

In addition, the NRC SER stated that Valve Relief Request No. 1 (VRR1) was not required because the method of exercising the SI Accumulator Discharge Check Valves was consistent with the OM-10, Paragraph 4.3.2.2 requirements. In response to this comment, the relief request was converted into a Valve Refueling Outage Justification (VROJ50) in Issue 2, Revision 0C of the BVPS-2 IST Program (copy enclosed) which was implemented on August 14, 1998.

If you have any questions regarding this request, please contact Mr. Sam Hobbs at (412) 393-5203.

Sincerely,



Sushil C. Jain

Enclosure

c: Mr. D. S. Brinkman, Sr. Project Manager
Mr. D. M. Kern, Sr. Resident Inspector
Mr. H. J. Miller, NRC Region I Administrator