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U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Reference: Beaver Valley Power Station, Unit No. 2
Docket No. 50-412, License No. NPF-73
Supplemental Response to NUREG 0737, Item III.D.1.1
(TAC 62924)

Gentlemen:

On August 7, 1986, DLCo provided a preliminary response to this issue. Due to the status of plant construction and procedure development at that time, DLCo did not address the safety injection system (for other than recirculation mode) and the radiation monitoring system in its response. Subsequently, SSER-5 indicated that the list of plant equipment contained in the preliminary response was not comprehensive enough but operation through the first refueling was justified. The following information supplements the preliminary response for those systems not already addressed.

Safety Injection System

An Operating Surveillance Test, "High Energy Line and ECCS Inspection" is performed on a quarterly frequency. This procedure employs a visual examination of lines outside containment to detect external leakage. Another test, "Safety Injection Recirc. Mode Leak Test", provides visual inspection for leaks in many components which are common to both the injection and recirculation mode. This test is performed on a refueling frequency. Both tests result in corrective actions through the maintenance program when deficiencies are noted.

Radiation Monitoring System

Portions of the radiation monitoring system outside containment which use piping or ducting to carry fluid samples outside of the monitored system have been reviewed. These monitors fit at least one of the following criteria:

1. The monitor is not conducting fluid from a system which requires leakage monitoring.

2. Fluid activity of the monitored system is not affected by an accident in containment.

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3. The monitor would not conduct highly radioactive fluids as a result of an accident.

4. The monitor is isolated by containment isolation or high radiation signals.

5. The monitor checks fluids which are already in the environment or being released to the environment.

Therefore, a leak reduction program described in NUREG 0737 is not applicable to this system.

DLCo plans to continue its program of testing, maintenance, training and administrative controls previously discussed for other systems. Therefore, if additional concerns exist which would impact operation of BVPS-2 beyond the first refueling, please identify them as early as possible.

Sincerely,

J. D. Sieber

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cc: Mr. J. Beall, Sr. Resident Inspector
Mr. W. T. Russell, NRC Region I Administrator
Mr. P. Tam, Project Manager