



Duquesne Light

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2NRC-8-001

United States 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
BVPS-2 FSAR Chapter 14, Test Change Status Report

Gentlemen:

Forwarded to NRC is the sixth status report identifying changes to the Initial Test Program as described in Chapter 14, of the FSAR. These changes are made in accordance with the provisions of 10CFR50.59 and reported to NRC in accordance with 50.59(b) within one month of initiating changes per BVPS-2 Facility Operating License Condition C.(3).

Very truly yours,

J. J. Carey
Senior Vice President
Nuclear Group

Attachment

cc: Mr. J. Beall, Sr. Resident Inspector
Mr. W. T. Russell, NRC Region I Administrator
Mr. P. Tam, Project Manager
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BVPS-2 FSAR Chapter 14 Test Change Status Report

- | <u>FSAR SECTION</u> | <u>TITLE</u> |
|------------------------------------|---------------------------------|
| 1. 14.2.12.57.01
(SOV-2.40A.01) | Plant Communications Test (SOV) |

Test SOV-2.40A.01 was scheduled to be completed by December 31, 1987. Communications required by Technical Specification 3.9.5 to support refueling were tested satisfactorily and used during the Initial Core Loading. Approximately 70% of this test has been performed. Modifications are presently being made to this system, and it is anticipated that the remainder of this test will be completed by the First Refueling.

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| 2. 14.2.12.73.02
(SOV-2.45D.01) | Non-QA Category I Heat Tracing
System Test (SOV) |
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Test SOV-2.45D.01 was scheduled to be completed prior to December 15, 1987. The systems involved are operable however, only approximately 80% of the circuits are successfully tested. Final testing is scheduled to be completed by the First Refueling. There are no Technical Specification requirements associated with these systems.

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| 3. 14.2.12.77.01
(PO-2.66.01) | Fuel Handling Test (PO) |
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Reference: (a) DLC Letter 2NRC-7-143 dated May 25, 1987,
"Plant Readiness for Fuel Loading"

Based on the present licensing commitment, PO-2.66.01, "Fuel Handling Equipment Test" was required to be completed prior to core load. During preparation of the BVPS-2 Startup Report on December 16, 1987, it was discovered that this test was not included in Reference (a) as a deferred test. Our intentions to defer retesting until prior to the First Refueling were fully visible in the Test Results Report as approved by the Joint Test Group and the Onsite Safety Committee, and in the Testing Tracking Computer Printouts.

Sequence of Events that affect this test deferral are as follows:

- a) On May 23, 1987, the subject test was satisfactorily completed and evaluated against the acceptance criteria to support fuel load. Test deficiencies were also evaluated and determined not to have any impact on core load. Steps deferred due to equipment unavailable for testing, were identified in the preliminary draft TRR which stated they would be deferred until after core load.

BVPS-2 FSAR Chapter 14 Test Change Status Report, (Cont'd)

<u>FSAR SECTION</u>	<u>TITLE</u>
14.2.12.77.01 (PO-2.66.01)	Fuel Handling Test (PO), Cont'd
b)	On June 5, 1987, Retests 66-002, 3, 4, 5 and 6 were generated to track untested steps. Deferral of these steps was not formally submitted to the NRC, but the Systems Testing Section's intentions to defer the steps was fully visible in the approved TRR and in In-house Testing Tracking Computer Printouts made available to the NRC. The TRR was approved on August 28, 1987 and the Computer Printouts were updated on an ongoing basis fully stating that these retests were not required to be completed until prior to the first refueling. The retests were also discussed as deferred in IST-2.01A.10, "Startup Testing Program". The failure to properly document this test deferral was attributed to an oversight in the test deferral process.
c)	On December 16, 1987, while preparing the BVPS-2 Startup Report, a Test Engineer discovered that Retests 66-002, 3, 4, 5 and 6 were not deferred until after core load, and prior to the first refueling as previously thought. Retests 66-002, 3, 4 and 6 were completed on September 4, 1987, however, Retest 66-005 still remains to be performed. Due to Licensing notification requirements, the NRC was notified on the red phone in the Control Room within the twenty-four (24) hour requirement. Personnel involved have been cautioned on properly documenting startup testing deferral requirements.

There were no safety implications to the plant or public as a result of this event. The components listed in this test deferral are not required to support normal plant operation. Unit 2 has been operating at normal power operation and is not affected operationally by this test deferral.

This report is being submitted in accordance with the License requirements and the requirements specified in 10 CFR 50.73.

This test satisfactorily completed all testing required to support fuel load. There are no Technical Specification requirements for the Fuel Handling Equipment affected and the untested equipment is not safety related. The untested equipment was not needed during initial core loading and is not required to be available until the First Refueling. All retesting was completed prior to Commercial Operations except for testing of the RCC Change Fixture (Retest 66-005) which is being deferred until the First Refueling.