



# Duquesne Light

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2NRC-7-020

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January 30, 1987

Mr. Harold R. Denton  
Office of Nuclear Reactor Regulation  
United States Nuclear Regulatory Commission  
Washington, DC 20555

ATTENTION: Mr. Peter Tam, Project Manager  
Division of PWR Licensing - A  
Office of Nuclear Reactor Regulation

SUBJECT: Beaver Valley Power Station - Unit No. 2  
Docket No. 50-412  
PSI Program, Insulated Component Supports

REFERENCE: 1) DLC Letter 2NRC-5-154, dated December 26, 1985

Gentlemen:

The following information is provided to identify the Preservice Inspection Program Criteria and Methodology for Visual examination (VT-3) of component supports which were selected for examination where a portion of the support (within the IWF examination boundary) is covered/buried with insulation. The insulation will not be removed during the PSI examination, based on the ASME Section XI, IWF 1300(e), which states in part, "Where the mechanical connection of a non-integral support is buried within the component insulation, the support boundary may extend from the surface of the component insulation provided the support either carries the weight of the component or serves as a structural restraint in compression." An alternative to the code is being utilized to include those supports not otherwise covered by this exemption. Exceptions to the above will be:

1. When relevant indications are observed which have been evaluated as unacceptable for continued service and which are observed adjacent to the portion covered/buried by insulation, the insulation shall be removed in that area and visual examination (VT-3) shall be performed for the balance of the component support to the IWF boundary within the insulated area.
2. When bulges or insulation distortions are observed in the component support contiguous area.

These exceptions will apply when any component support has relevant indications, regardless of the exclusion by IWF 1300(e).

The Acceptance Standards for component supports selected for examination shall be in compliance with IWF-3410, Acceptance Standards - Component Support Structural Integrity, ASME Section XI, 1980 Edition, Winter 1981 Addenda.

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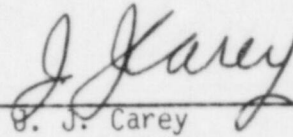
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United States Nuclear Regulatory Commission  
Mr. Harold R. Denton, Director  
PSI Program, Insulated Component Supports  
Page 2

The above is considered as an alternative to the ASME XI PSI Program for BVPS-2, as verbally concurred between DLC and NRR during January 5, 1987 telecon.

DUQUESNE LIGHT COMPANY

By



G. J. Carey  
Sr. Vice President

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