schottile EAR REQUE 50-334 UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001 October 8, 1997 Mr. J. E. Cross President - Generation Group Duquesne Light Company Post Office Box 4 Shippingport, PA 15077 SUBJECT: SAFETY EVALUATION OF BEAVER VALLEY POWER STATION, UNIT NOS. 1 AND 2 (BVPS-1 AND BVPS-2), 10-YEAR INSERVICE INSPECTION (ISI) RELIEF REQUESTS (TAC NOS. M98253 AND M98254) Dear Mr. Cross: By letter dated March 25, 1997, as supplemented August 29, 1997, Duquesne Light Company (DLC) submitted eight requests for relief from the ISI requirements of Section XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code). Three of these requests are applicable to BVPS-1, three are applicable to BVPS-2, and two are applicable to both BVPS-1 and BVPS-2. The U.S. Nuclear Regulatory Commission (NRC) staff with technical assistance from its contractor, the Idaho National Engineering and Environmental Laboratory (INEEL), has reviewed and evaluated DLC's March 25 and August 29, 1997, requests for relief. As described in the attached safety evaluation (SE), the staff adopts the INEEL conclusions and recommendations presented in the technical letter report (TLR), which is attached to the SE. For requests for relief BV1-B3.120-2 and BV3-IWA-2, the NRC staff concluded that imposing the Code requirements on DLC results in a hardship or unusual difficulty without a compensating increase in the level of quality and safety. Therefore, DLC's proposed alternatives are authorized pursuant to the Code of Federal Regulations (CFR), 10 CFR 50.55a(a)(3)(ii). In addition, pursuant to 10 CFR 50.55a(a)(3)(ii), DLC's proposed alternative, which is contained in request for relief BV3-IWA-1 is authorized for Class 1 bolted connections, but for Class 2 systems, the frequencies proposed for insulation removal have not been found acceptable by the NRC staff. Therefore, DLC's proposed alternative for the Class 2 systems is denied. For request for relief BV2-D2.20-1, the NRC staff concluded that DLC's proposed alternative provides an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), DLC's proposed alternative is authorized for Class 3 integrally-welded attachments. Use of alternatives contained in Code Case N-509 are authorized for the first interval or until such time as the Code Case is published in a future revision of Regulatory Guide 1.147. At that time, if the licensee intends to continue to implement this code case for Class 3 items, the licensee should follow all provisions in Code Case N-509, with limitations issued in Regulatory Guide 1.147, if any. For requests for relief BV1-B9.31-2 and BV2-B3.110-2, the NRC staff concluded that the ASME Code examination requirements are impractical. Therefore, 9710210164 971008 PDR ADOCK 05000334 NEG FILE CENTER COPY

pursuant to 10 CFR 50.55a(g)(6)(i), DLC's request for relief is granted. The reliefs and alternatives imposed are authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest given due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility.

Requests for relief BV1-RV-WELDS and BV2-B1.11-1 were submitted to DLC to address limited ASME Code examination coverage for reactor vessel welds. However, DLC has yet to fulfill the augmented examination requirements found in 10 CFR 50.55a(g)(6)(ii)(A) for welds that were not essentially 100% examined. Therefore, the NRC staff concluded that evaluation of these requests are to be deferred until such time as DLC has satisfied the regulations by submitting an alternative to the augmented examination for reactor pressure vessel welds where essentially 100% volumetric coverage was not obtained.

Sincerely.

John F. Stolz, Director Project Directorate I-2 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Docket Nos. 50-334 and 50-412

Enclosure: Safety Evaluation

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Sincerely,

John F. Stolz, Director

Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

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cc w/encl: See next page

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