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November 19, 1999
L-99-166

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

Subject: Beaver Valley Power Station, Unit No. 1 and No. 2
BV-1 Docket No. 50-334, License No. DPR-66
BV-2 Docket No. 50-412, License No. NPF-73
Withdraw Part of License Amendment Request Nos. 264 and 139
(TAC Nos. MA5073 and MA5074)

This letter requests withdrawal of a specific portion of a sentence contained in License Amendment Request Nos. 264 and 139 submitted by Letter L-99-045 dated March 16, 1999. Specifically, the words contained in the first sentence of Insert "A" for (BV-1) and Insert "B" for (BV-2) which are as follows: "and is outside those typically postulated by the NRC for reactor sites." Based on discussions between members of the NRC and the Duquesne Light Company staff, the determination was made that these words do not provide any meaningful value to the Bases section and should be deleted from the sentence. Therefore, Attachments A-1 (for BV-1) and A-2 (for BV-2) contain the revised Inserts for the Bases pages that reflect the deletion of this wording.

If there are any questions concerning this matter, please contact Mr. Mark S. Ackerman, Manager, Safety & Licensing Department at 412-393-5203.

Sincerely,

James E Cross
James E. Cross

c: Mr. D. S. Collins, Project Manager
Mr. D. M. Kern, Sr. Resident Inspector
Mr. H. J. Miller, NRC Region I Administrator
Mr. W. P. Dornsife, Director BRP/DEP
Mr. M. P. Murphy (BRP/DEP)

DELIVERING
QUALITY
ENERGY

A001

AFFIDAVIT FOR APPLICATION

OF AMENDMENT

COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF BEAVER)

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Before me, the undersigned notary public, in and for the County and Commonwealth aforesaid, this day personally appeared James E. Cross, to me known, who being duly sworn according to law, deposes and says that he is President, Generation Group, Duquesne Light Company, he is duly authorized to execute and file the foregoing submittal on behalf of said Company, and the statements set forth in the submittal are true and correct to the best of his knowledge, information and belief.

James E. Cross

Subscribed and sworn to before me
on this 19th day of November, 1999

Tracey A. Baczek
Notary Public

Notarial Seal
Tracey A. Baczek, Notary Public
Shippingport Boro, Beaver County
My Commission Expires Aug. 16, 2001
Member, Pennsylvania Association of Notaries

Attachment A-1
Beaver Valley Power Station, Unit No. 1
License Amendment Request No. 264

INSERT "A"

The scenario of a postulated gasoline barge impact with the intake structure and coincident explosion disabling the Reactor Plant River Water System (RPRWS) is a low probability event. Nonetheless, the ARWS provides defense in-depth in assuring shutdown cooling capability. The requirement to operate the ARWS is not coincident with a postulated Design Basis Accident, but only for the postulated gasoline barge impact event.

Although the ARWS is a manually operated non-safety system which is not required to meet single active failure criteria, the system is designed with redundant pumps and valves on a header to accommodate a single active failure on start-up. This design criteria provides a defense in-depth in order to ensure the system can adequately mitigate the consequences of the postulated event. An ARWS pump can be manually started on the emergency bus during loss of offsite power after the diesel loading sequence is complete. If there is a delay in starting the ARWS, the auxiliary feedwater system is available to remove reactor core decay heat for a short term period.

The requirements for subsystem OPERABILITY are similar to those of the RPRWS except that one subsystem is required to be OPERABLE in the MODES noted. The Limiting Condition for Operation reflects the low risk of the postulated event compared to more stringent requirements associated with safety related systems. The ACTION statement takes into account the low probability of both trains of RPRWS being disabled as a result of the postulated site scenario coincident with one of the ARWS subsystems being OPERABLE.

Attachment A-2
Beaver Valley Power Station, Unit No. 2
License Amendment Request No. 139

INSERT "B"

The scenario of a postulated gasoline barge impact with the intake structure and coincident explosion disabling the SWS is a low probability event. Nonetheless, the SWE provides defense in-depth in assuring shutdown cooling capability. The requirement to operate the SWE is not coincident with a postulated Design Basis Accident, but only for the postulated gasoline barge impact event.

Although the SWE is a non-safety system which is not required to meet single active failure criteria, the system is designed with redundant pumps and valves on a header to accommodate a single active failure on start-up. This design criteria provides a defense in-depth in order to ensure the system can adequately mitigate the consequences of the postulated event. An SWE pump can be manually started on the emergency bus during loss of offsite power after the diesel loading sequence is complete. With no loss of power signal present, the SWE is automatically started upon receipt of low service water header pressure signal. This feature is provided to prevent inadvertent plant trip on loss of running service water pump and is not required for the design basis event. If there is a delay in starting the SWE, the auxiliary feedwater system is available to remove reactor core decay heat for a short term period.

The requirements for subsystem OPERABILITY are similar to those of the SWS except that one subsystem is required to be OPERABLE in the MODES noted. The Limiting Condition for Operation reflects the low risk of the postulated event compared to more stringent requirements associated with safety related systems. The ACTION statement takes into account the low probability of both trains of SWS being disabled as a result of the postulated scenario coincident with one of the SWE subsystems being OPERABLE.