

# Duquesne Light Company

Beaver Valley Power Station  
P.O. Box 4  
Shippingport, PA 15077-0004

JOHN D. SIEBER  
Vice President - Nuclear Group

(412) 393-5255

March 9, 1990

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

Reference: 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  
Combined Inspection Report Nos. 50-334/89-25  
and 50-412/89-23

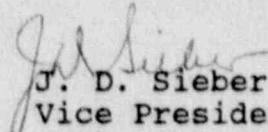
Gentlemen:

The NRC correspondence dated February 7, 1990 which transmitted the above referenced Inspection Report also transmitted a Notice of Deviation included as Appendix A.

In accordance with 10 CFR Part 2, Appendix C, and as requested in your correspondence, attached is our reply to the Notice of Deviation.

If there are any questions concerning this response, please contact my office.

Very truly yours,

  
J. D. Sieber  
Vice President  
Nuclear Group

Attachment

cc: Mr. J. Beall, Sr. Resident Inspector  
Mr. W. T. Russell, NRC Region I Administrator  
Mr. Jacques P. Durr, Chief-Engineering Branch, Division of  
Reactor Safety, Region I  
Mr. P. Tam, Sr. Project Manager  
Mr. R. Saunders (VEPCO)

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DUQUESNE LIGHT COMPANY  
Nuclear Group  
Beaver Valley Power Station Units 1 & 2

Reply to Notice of Deviation  
Combined Inspection Report 50-334/89-25 and 50-412/89-23  
Letter Dated February 7, 1990

DEVIATION A

Description of Deviation (50-334/89-25-01)

R. G. 1.97 revision 3, Table 1, Category 1 Design and Qualification Criteria for Instrumentation, Section 2 (Redundancy) states, in part, that: "No single failure within either the accident monitoring instrumentation, its auxiliary supporting features, or its power sources concurrent with the failures that are a condition or result of a specific accident should prevent the operators from being presented the information necessary for them to determine the safety status of the plant and to bring the plant to and maintain it in a safe condition following an accident." Section 9 (Interfaces) states, in part, that: "The transmission of signals for other use should be through isolation devices that are designated as part of the monitoring instrumentation and that meet the provisions of this document."

1. Contrary to Section 2 above, on December 8, 1989, it was determined that separate indicators were not provided for the three post-accident instrument channels monitoring the Unit 1 Steam Generator Level-Wide Range variable.
2. Contrary to Section 9 above, on December 8, 1989, it was determined that the installed instrumentation for the Unit 1 Steam Generator Level-Wide Range does not have an isolation device between the instrument loops and the common strip chart three-pen recorder for transmitter channels FW-477, FW-487 and FW-497.

Corrective Actions Taken and Actions to Prevent Recurrence

Our response to this issue has previously been submitted to the NRC. Please refer to our letter dated January 31, 1990 on this subject.

Date Corrective Actions Will Be Completed

Please refer to our letter dated January 31, 1990 on this subject.

In addition, a conference call was held on March 8, 1990 between K. D. Grada of Duquesne Light Company and C. Anderson (Region I) and B. Marcus (NRR). Additional information supporting our request for a deviation on this instrumentation will be forwarded on March 21, 1990.

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Deviation B

Description of Deviation (50-412/89-23-03)

R. G. 1.97 revision 3, Table 1, Category 1 Design and Qualification Criteria for Instrumentation, Section 1, Paragraph 4 states, in part, that: "The seismic portion of qualification should be in accordance with R. G. 1.100, 'Seismic Qualification of Electric Equipment for Nuclear Power Plants.' Instrumentation should continue to read within the required accuracy, following, but not necessarily during, a safe shutdown earthquake."

Contrary to the above, on December 8, 1989, it was determined that the Unit 2 recorders for the Steam Generator Level-Narrow Range were not seismically qualified.

Corrective Actions Taken

We have reviewed the qualification for the Unit 2 recorders for the Steam Generator Level - Narrow Range and determined that they are not seismically qualified. We have also reviewed the instrument channels for the Unit 2 Steam Generator Level - Narrow range and determined that the recorders are electrically isolated from the 1E powered instrumentation channels. The recorders are not powered from a 1E source.

The indicating channels are qualified to the Regulatory Guide 1.97 Category 1 recommendations from the sensors to the displays (meters). The displays consist of nine (9) meters (3 per steam generator) located on the control room vertical boards. Consequently, there are three (3) redundant channels per steam generator level - narrow range.

We have also reviewed the Unit 2 Emergency Operating Procedures and have determined that the Steam Generator Level - Narrow Range Recorders are not required for immediate trending purposes by the operator. In the event that this information would not be available because of recorder failure, the operator could retrieve the level data stored in the computer.

Based on the results of our review as presented above, we believe that the Steam Generator Level - Narrow Range Recorders do not require seismic qualification. The seismic portion of qualification is from the sensors to the displays (meters) including the isolation devices. Therefore, we believe that Steam Generator Level - Narrow Range Instrumentation Channels comply with the recommendations of Regulatory Guide 1.97.

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Actions Taken to Prevent Recurrence

Based on the discussion presented, action to prevent recurrence is not required.

Date Corrective Actions Will Be Completed

Pending the NRC review of the results presented above, we believe that the corrective actions are complete.

DEVIATION C

Description of Deviation (50-412/89-23-02)

R. G. 1.97 revision 3, Table 1, Category 1 Design and Qualification Criteria for Instrumentation, Section 8 (Equipment Identification) states, in part, that: "Types A, B and C instruments designated as Category 1 and 2 should be specifically identified with a common designation on the control panels so that the operator can easily discern that they are intended for use under accident conditions.

Contrary to the above, on December 8, 1989, it was determined that the Unit 2 Post-Accident Monitoring Recorders were not specifically identified with a common designation.

Corrective Actions Taken

Corrective action was taken during the Inspection by initiating a written request to identify the Unit 2 Post Accident Monitoring (PAM) Recorders in the control room. The recorders have since been identified by labels signifying their PAM function. This includes all recorders monitoring variables that are designated as Types A, B and C, Category 1 and 2. It is noted that the recorders identified in Deviation B of this Inspection have not been labeled because of the results of the review provided in response to that deviation.

Actions Taken to Prevent Recurrence

The Administrative Guideline for Tagging of Equipment is being revised to specifically address Regulatory Guide 1.97 labeling in the control room.

Date Corrective Actions Will Be Completed

Corrective Actions have been completed.