



FirstEnergy Nuclear Operating Company

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January 16, 2002
L-02-009

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
License Amendment Request Nos. 298 and 170

Pursuant to 10 CFR 50.90, FirstEnergy Nuclear Operating Company (FENOC) requests an amendment to the above licenses in the form of changes to the technical specifications (TSs). The amendment requests administrative, editorial, and format changes to the TS index and the Administrative Controls section of TS. Specifically, the amendment requests a relocation of the TS Bases page listings from the TS index to a TS Bases index, and removal of certain administrative requirements from Section 6, "Administrative Controls," of the TSs.

The proposed administrative, editorial, and format changes do not affect plant safety. Relocation of the TS Bases page listings from the TS index to a TS Bases index is proposed in order to better facilitate control of the TS Bases under the Beaver Valley Power Station (BVPS) Bases Control Program. The BVPS Bases Control Program was reviewed and approved by the NRC through the issuance of Amendment Nos. 239 and 120, "Revised Thermal Design Procedure," dated July 20, 2001, for Unit Nos. 1 and 2, respectively. The administrative changes to Section 6 of the TSs are proposed to eliminate requirements that are redundant to those contained within Chapter 10, "Energy," of the Code of Federal Regulations (CFR) and to better align the BVPS TSs with the Westinghouse Improved Standard Technical Specifications (ISTS) guidance presented in NUREG-1431, Revision 2, issued by the NRC in April, 2001.

Proposed TS changes for Unit No. 1 are presented in Attachment A-1. Proposed TS changes for Unit No. 2 are presented in Attachment A-2. The safety analysis (including the no significant hazards evaluation) is presented in Attachment B.

Aool

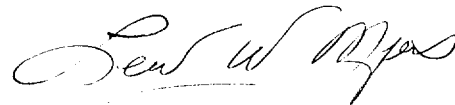
The BVPS review committees have reviewed these changes. These changes were determined to be safe and do not involve a significant hazard consideration as defined in 10 CFR 50.92 based on the evaluation presented in Attachment B.

An implementation period of up to 60 days is requested following the effective date of this amendment.

If there are any questions concerning this matter, please contact Mr. Larry R. Freeland, Manager, Regulatory Affairs/Corrective Actions, at 724-682-5284.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 16, 2002.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lew W. Myers".

Lew W. Myers

- c: Mr. L. J. Burkhart, Project Manager
Mr. D. M. Kern, Sr. Resident Inspector
Mr. H. J. Miller, NRC Region I Administrator
Mr. D. A. Allard, Director BRP/DEP
Mr. L. E. Ryan (BRP/DEP)

ATTACHMENT A-1

Beaver Valley Power Station, Unit No. 1
License Amendment Request No. 298

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ADMINISTRATIVE CONTROLS

6.2.2 UNIT STAFF

The unit organization shall be subject to the following:

- A.2

 a. ~~Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2 1.~~
Insert 1
- A.3

 b. ~~At least one licensed Operator shall be in the control room when fuel is in the reactor.~~ Insert 2
- A.4

 c. ~~At least two licensed Operators shall be in the control room during reactor startup, scheduled reactor shutdown and during recovery from reactor trips.~~
- L.1

 dc. ~~An individual qualified in radiation protection procedures shall be onsite when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.~~
- A.5

 e. ~~All CORE ALTERATIONS after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.~~
- L.2

 fd. ~~Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety related functions; senior reactor operators, reactor operators, radiation control technicians, auxiliary operators, meter and control repairman, and all personnel actually performing work on safety related equipment.~~

~~The objective shall be to have operating personnel work a normal 8 hour day, 40 hour week while the plant is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance or major plant modifications, on a temporary basis, the following guidelines shall be followed:~~
 - ~~a. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.~~
 - ~~b. An individual should not be permitted to work more than 16 hours in any 24 hour period, nor more than 24 hours in any 48 hour period, nor more than 72 hours in any 7 day period, all excluding shift turnover time.~~

Attachment A-1
Beaver Valley Power Station, Unit No. 1
License Amendment Request No. 298

A.9 INSERT 1 (for TS 6.2.2.a.):

A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator shall be assigned for each control room from which a reactor is operating in MODES 1, 2, 3, or 4.

A.10 INSERT 2 (for TS 6.2.2.b.):

Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 6.2.2.a and 6.2.2.f for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

ADMINISTRATIVE CONTROLS

UNIT STAFF (Continued)

L2

~~c. A break of at least eight hours should be allowed between work periods, including shift turnover time.~~

~~d. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.~~

~~Any deviation from the above guidelines shall be authorized by the plant manager or predesignated alternate, or higher levels of management. Authorized deviations to the working hour guidelines shall be documented and available for NRC review. Insert 3~~

ge. The operations manager shall either hold a senior reactor operator license or have held a senior reactor operator license for a pressurized water reactor. The assistant operations manager shall hold a current senior reactor operator license.

A.11

f. An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift. A single qualified person can be used to satisfy the requirements of this position for both units.

Attachment A-1
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L.2

INSERT 3 (for TS 6.2.2.d.):

Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety related functions (e.g., licensed Senior Reactor Operators, licensed Reactor Operators, radiation control technicians, auxiliary operators, and key maintenance personnel).

The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.

Any deviation from the above guidelines shall be authorized in advance by the plant manager or the plant manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the working hour guidelines shall not be authorized.

Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned.

~~DELETE Entire Page~~
~~TABLE 6.2 1~~

~~MINIMUM SHIFT CREW COMPOSITION#~~

~~SINGLE UNIT FACILITY~~

LICENSE CATEGORY QUALIFICATIONS	APPLICABLE MODES	
	1, 2, 3 and 4	5 and 6
SRO*	2	1**
RO	2	1
Non-Licensed Auxiliary Operator	2	1
Shift Technical Advisor	1(a)	None Required

~~* Includes the Licensed Senior Reactor Operator serving as the Shift Supervisor.~~

~~** Does not include the licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling, supervising CORE ALTERATIONS.~~

~~# Shift crew composition may be one less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2 1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.~~

~~(a) A single qualified person can be used to satisfy the requirements of the STA position for both units.~~

ADMINISTRATIVE CONTROLS

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility and radiation protection staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the operations manager as specified in Specification 6.2.2.ge, the radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and the technical advisory engineering representative who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and response analysis of the plant for transients and accidents.

A.6

6.4 ~~TRAINING~~DELETED

6.4.1 ~~A retraining and replacement training program for the facility staff shall be maintained and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55.~~

6.5 DELETED

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified in accordance with 10 CFR 50.72 and/or a report be submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50., and

A.12

- b. ~~Each REPORTABLE EVENT shall be reviewed by the OSC, and the results of this review shall be submitted to the ORC.~~

6.7 ~~SAFETY LIMIT VIOLATION~~DELETED

6.7.1 ~~The following actions shall be taken in the event a Safety Limit is violated:~~

A.13

- a. ~~The facility shall be placed in at least HOT STANDBY within one (1) hour.~~

A.7
A.14

- b. ~~The Safety Limit violation shall be reported to the Commission within one hour and to the plant manager and to the ORC within 24 hours.~~

A.15

- c. ~~A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the On Site Safety Committee (OSC). This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.~~

ADMINISTRATIVE CONTROLS

SAFETY LIMIT VIOLATION (Continued)

A.8
A.16

- d. ~~The Safety Limit Violation Report shall be submitted to the Commission, the ORC and the plant manager within 30 days of the violation.~~

6.8 PROCEDURES

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Not used.
- e. Not used.
- f. Fire Protection Program implementation.
- g. PROCESS CONTROL PROGRAM implementation.
- h. OFFSITE DOSE CALCULATION MANUAL implementation.


6.8.2 Deleted

6.8.3 Deleted

6.8.4 Deleted

ATTACHMENT A-2

Beaver Valley Power Station, Unit No. 2
License Amendment Request No. 170



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ADMINISTRATIVE CONTROLS

6.2.2 UNIT STAFF

The unit organization shall be subject to the following:

- A.2

 a. ~~Each duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1. INSERT 1~~
- A.3

 b. ~~At least one licensed operator shall be in the control room when fuel is in the reactor. INSERT 2~~
- A.4

 c. ~~At least two licensed operators shall be in the control room during reactor start up, scheduled reactor shutdown and during recovery from reactor trips.~~
- L.1

 d. ~~An individual qualified in radiation protection procedures shall be onsite when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.~~
- A.5

 e. ~~All CORE ALTERATIONS after the initial fuel loading shall be directly supervised by either a licensed senior reactor operator or senior reactor operator limited to fuel handling who has no other concurrent responsibilities during this operation.~~
- L.2

 f. ~~Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety related functions; senior reactor operators, reactor operators, radiation control technicians, auxiliary operators, meter and control repairman, and all personnel actually performing work on safety related equipment.~~

~~The objective shall be to have operating personnel work a normal 8 hour day, 40 hour week while the plant is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance or major plant modifications, on a temporary basis, the following guidelines shall be followed:~~

- ~~a. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.~~
- ~~b. An individual should not be permitted to work more than 16 hours in any 24 hour period, nor more than 24 hours in any 48 hour period, nor more than 72 hours in any seven day period, all excluding shift turnover time.~~
- ~~c. A break of at least eight hours should be allowed between work periods, including shift turnover time.~~

Attachment A-2
Beaver Valley Power Station, Unit No. 2
License Amendment Request No. 170

A.9 INSERT 1 (for TS 6.2.2.a.):

A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator shall be assigned for each control room from which a reactor is operating in MODES 1, 2, 3, or 4.

A.10 INSERT 2 (for TS 6.2.2.b.):

Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 6.2.2.a and 6.2.2.f for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

ADMINISTRATIVE CONTROLS

UNIT STAFF (Continued)

L2

- d. ~~Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.~~

~~Any deviation from the above guidelines shall be authorized by the plant manager or predesignated alternate, or higher levels of management. Authorized deviations at the working hour guidelines shall be documented and available for NRC review.~~ INSERT 3

- ge. The operations manager shall either hold a senior reactor operator license or have held a senior reactor operator license for a pressurized water reactor. The assistant operations manager shall hold a current senior reactor operator license.

A.11

- f. An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift. A single qualified person can be used to satisfy this position for both units.

Attachment A-2
Beaver Valley Power Station, Unit No. 2
License Amendment Request No. 170

L2

INSERT 3 (for TS 6.2.2.d.):

Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety related functions (e.g., licensed Senior Reactor Operators, licensed Reactor Operators, radiation control technicians, auxiliary operators, and key maintenance personnel).

The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.

Any deviation from the above guidelines shall be authorized in advance by the plant manager or the plant manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the working hour guidelines shall not be authorized.

Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned.

~~DELETE Entire Page~~~~TABLE 6.2-1~~~~MINIMUM SHIFT CREW COMPOSITION #~~~~SINGLE UNIT FACILITY~~

LICENSE CATEGORY	APPLICABLE MODES	
	1, 2, 3 and 4	5 and 6
SRO*	2	1**
RO	2	1
Non Licensed Auxiliary Operator	2	1
Shift Technical Advisor	1^{††}	None Required

~~*Includes the Licensed Senior Reactor Operator serving as the Shift Supervisor.~~

~~**Does not include the Licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling, supervising CORE OPERATIONS.~~

~~#Shift crew composition may be one less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.~~

~~^{††}The Shift Technical Advisor (STA) position may be filled by the same STA from the BVPS Unit 1, if the individual is qualified for BVPS Unit 2.~~

ADMINISTRATIVE CONTROLS

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility and radiation protection staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the operations manager as specified in Specification 6.2.2. ~~ge~~, the radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and the technical advisory engineering representative who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and response analysis of the plant for transients and accidents.

A.6

6.4 TRAINING~~DELETED~~

~~6.4.1 A retraining and replacement training program for the facility staff shall be maintained and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55.~~

6.5 ~~DELETED~~

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified in accordance with 10 CFR 50.72 and/or a report be submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50. ~~7~~ and

A.12

- ~~b. Each REPORTABLE EVENT shall be reviewed by the OSC, and the results of this review shall be submitted to the ORC.~~

6.7 SAFETY LIMIT VIOLATION~~DELETED~~

~~6.7.1 The following actions shall be taken in the event a Safety Limit is violated:~~

A.13

- ~~a. The facility shall be placed in at least HOT STANDBY within one (1) hour.~~

A.7
A.14

- ~~b. The Safety Limit violation shall be reported to the Commission within one hour. The Safety Limit violation shall be reported to the plant manager and to the ORC within 24 hours.~~

A.15

- ~~c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the On Site Safety Committee (OSC). This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.~~

ADMINISTRATIVE CONTROLS

SAFETY LIMIT VIOLATION (Continued)

A.8
A.16

- d. ~~The Safety Limit Violation Report shall be submitted to the Commission, the ORC and the plant manager within 30 days of the violation.~~

6.8 PROCEDURES

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Not used.
- e. Not used.
- f. Fire Protection Program implementation.
- g. PROCESS CONTROL PROGRAM implementation.
- h. OFFSITE DOSE CALCULATION MANUAL implementation.

6.8.2 Deleted

6.8.3 Deleted

6.8.4 Deleted

ATTACHMENT B

Beaver Valley Power Station, Unit Nos. 1 and 2
License Amendment Request Nos. 298 and 170
ADMINISTRATIVE REVISIONS TO TECHNICAL SPECIFICATIONS

A. DESCRIPTION OF AMENDMENT REQUEST

Pursuant to 10 CFR 50.90, FirstEnergy Nuclear Operating Company (FENOC) requests an amendment to the Beaver Valley Power Station (BVPS), Unit No. 1 and No. 2, facility operating licenses DPR-66 and NPF-73, respectively, in the form of changes to the technical specifications (TSs). The amendment requests administrative, editorial, and format (including repagination) changes to the TS index and the Administrative Controls section of TS. Specifically, the amendment requests a relocation of the TS Bases page listings from the TS index to a TS Bases index, and removal of certain duplicative administrative requirements from Section 6, "Administrative Controls," of the TSs.

The proposed administrative, editorial, and format changes do not affect plant safety. Relocation of the TS Bases page listings from the TS index to a TS Bases index is proposed in order to better facilitate control of the TS Bases under the Beaver Valley Power Station (BVPS) Bases Control Program. The BVPS Bases Control Program was reviewed and approved by the NRC through the issuance of Amendment Nos. 239 and 120, "Revised Thermal Design Procedure," dated July 20, 2001, for Unit Nos. 1 and 2, respectively. Administrative changes to Section 6 of the TSs are proposed to eliminate requirements that are redundant to those contained within Chapter 10, "Energy," of the Code of Federal Regulations (CFR).

Other changes to Section 6 of the TSs are proposed to better align the BVPS TSs with the Westinghouse Improved Standard Technical Specifications (ISTS) guidance presented in NUREG-1431, Revision 2, issued by the NRC in April 2001.

B. DESIGN BASES

The proposed administrative changes are not related to any technical design basis.

C. JUSTIFICATION

The proposed administrative, editorial, and format changes do not affect plant safety. Relocation of the TS Bases page listings from the TS index to a TS Bases

index is proposed in order to better facilitate control of the TS Bases under the BVPS Bases Control Program. The BVPS Bases Control Program was reviewed and approved by the NRC through the issuance of Amendment Nos. 239 and 120, "Revised Thermal Design Procedure," dated July 20, 2001, for Unit Nos. 1 and 2, respectively.

A.1 Removal of TS Bases page listings from TSs.

These changes are acceptable because the NRC has approved the removal of the TS Bases from TSs to be controlled by the BVPS Bases Control Program. It follows that the corresponding TS Bases Index listings should be removed from the TSs and maintained in the BVPS Bases Control Program. These changes are designated administrative because they do not result in technical changes to the current TS.

Administrative changes to Section 6 of the TSs are proposed to eliminate requirements that are redundant to those contained within Chapter 10, "Energy," of the Code of Federal Regulations (CFR).

A.2 TS 6.2.2.a. states, "Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1." This requirement statement and Table 6.2-1 are proposed to be removed from TSs.

The purpose of Table 6.2-1 is to specify the minimum shift crew composition consistent with 10 CFR 50.54(m)(2)(i). This proposed change is acceptable because 10 CFR 50.54(m)(2)(i) already states this required composition. Use of the staffing requirements in 10 CFR 50.54(m)(2)(i) will not result in a reduction in the current minimum shift crew composition. This change is designated administrative because it does not result in technical changes to the current TS.

For informational purposes, FENOC intends to pursue dual-unit licenses for the BVPS licensed operations staff in the future. After NRC issuance of a sufficient number of dual-unit operator licenses for BVPS Unit Nos. 1 and 2 in accordance with 10 CFR Part 55, the minimum on-shift licensed operator staffing could be reduced in accordance with the requirements of 10 CFR 50.54(m)(2)(i) for a two unit reactor site with dual-unit licensed operators.

- A.3 TS 6.2.2.b. states, "At least one licensed Operator shall be in the control room when fuel is in the reactor." This requirement statement is proposed to be removed from TSs .

The purpose of TS 6.2.2.b is to specify the minimum shift crew composition when fuel is in the reactor consistent with 10 CFR 50.54(m)(2)(iii). This proposed change is acceptable because 10 CFR 50.54(m)(2)(iii) already states this required composition. This change is designated administrative because it does not result in technical changes to the current TS.

- A.4 TS 6.2.2.c. states, "At least two licensed Operators shall be in the control room during reactor startup, scheduled reactor shutdown and during recovery from reactor trips." This requirement statement is proposed to be removed from TSs.

The purpose of TS 6.2.2.c is to specify the minimum shift crew composition consistent with 10 CFR 50.54(m)(2)(i). This proposed change is acceptable because 10 CFR 50.54(m)(2)(i) already states this required composition. This change is designated administrative because it does not result in technical changes to the current TS.

- A.5 TS 6.2.2.e. states, "All CORE ALTERATIONS after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation." This requirement statement is proposed to be removed from TSs.

The purpose of TS 6.2.2.e. is to specify the minimum shift crew composition during core alterations consistent with 10 CFR 50.54(m)(2)(iv). This proposed change is acceptable because 10 CFR 50.54(m)(2)(iv) already states this required composition. Additionally, this requirement is not contained in the ISTS. This change is designated administrative because it does not result in technical changes to the current TS.

- A.6 TS 6.4, "Training," subsection TS 6.4.1 states, "The retraining and replacement training program for the facility staff shall be maintained and shall meet or exceed the requirements and recommendations of Section 5.5

of ANSI N18.1-1971 and 10 CFR Part 55.” This requirement statement is proposed to be removed from TSs.

The purpose of TS 6.4 and its subsection TS 6.4.1 is to specify training consistent with Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55. This proposed change is acceptable because 10 CFR 50.34(b)(6)(i) and 10 CFR Part 55 already address these training requirements. Additionally, the requirements of the ANSI standard are current requirements contained in the Updated Final Safety Analysis Report (UFSAR) and this requirement is not specified in the ISTS. This change is designated administrative because it does not result in technical changes to the current TS.

- A.7 TS 6.7, “Safety Limit Violation,” subsection 6.7.1, subpart b. states, in part, “The Safety Limit violation shall be reported to the Commission within one hour...” This requirement statement is proposed to be removed from TSs.

This change is acceptable because the this requirement is redundant to the reporting requirements of 10 CFR 50.72. This change is designated administrative because it does not result in technical changes to the current TS.

- A.8 TS 6.7, “Safety Limit Violation,” subsection 6.7.1, subpart d. states, in part, “The Safety Limit Violation Report shall be submitted to the Commission ... within 30 days of the violation.” This requirement statement is proposed to be removed from TSs.

This change is acceptable because the reporting requirements of 10 CFR 50.73 already address this requirement. The elimination of this requirement will also preclude updating the 30-day reporting period to reflect the 60-day reporting period now contained in 10 CFR 50.73 through recent rulemaking. This change is designated administrative because it does not result in technical changes to the current TS.

Other administrative changes to Section 6 of TSs are proposed to better align the BVPS TSs with the Westinghouse Improved Standard Technical Specifications (ISTS) guidance presented in NUREG-1431, Revision 2, issued by the NRC in April 2001.

- A.9 TS 6.2.2.a. is proposed to be replaced in TSs with the text of ISTS 5.2.2.a., which states, “A non-licensed operator shall be assigned to each reactor

containing fuel and an additional non-licensed operator shall be assigned for each control room from which a reactor is operating in MODES 1, 2, 3, or 4.”

The purpose of this new requirement statement is to retain an existing requirement. This requirement was captured in the existing Table 6.2-1 for non-licensed operators. This proposed change is acceptable because it is consistent with the ISTS requirements, the NRC interpretation for the implementation of 10 CFR 50.54(m)(2)(i), and the current licensing basis (CLB) for the BVPS units. This change is designated administrative because it does not result in technical changes to the current TS.

- A.10 TS 6.2.2.b. is proposed to be replaced in TSs with the text of ISTS 5.2.2.b., which will be modified slightly to state, “Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 6.2.2.a and 6.2.2.f for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.” The modification to the ISTS requirement only changes the numeric subsections to align with the appropriate subsections of the BVPS TSs.

The purpose of this new requirement statement is to retain an existing requirement. This requirement was captured as a footnote to the existing Table 6.2-1 to accommodate unexpected absence of on-duty shift members. This proposed change is acceptable because it is consistent with the ISTS requirements, the NRC interpretation of implementing 10 CFR 50.54(m)(2)(i), and the CLB for the BVPS units. The new requirement statement also does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crew member being late or absent since the unexpected absence clause only applies to on-duty shift crew members. This is consistent with the current TS requirements and does not result in a less restrictive requirement. This change is designated administrative because it does not result in technical changes to the current TS and does not provide a relaxation from current requirements.

- A.11 TS 6.2.2.f. is proposed to be added in TSs in conjunction with the replacement of TS 6.2.2.b. with the text of ISTS 5.2.2.b. as described above. TS 6.2.2.f. is proposed to state, “An individual shall provide advisory technical support to the unit operations shift crew in the areas of

thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.” Additionally, TS 6.2.2.f. is proposed to state, “A single qualified person can be used to satisfy the requirements of this position for both units.”

The purpose of this new requirement statement is to retain an existing requirement. This requirement was captured as a footnote to the existing Table 6.2-1 to provide for Shift Technical Advisors. This proposed change is acceptable because it is consistent with the ISTS requirements, the NRC interpretation of implementing 10 CFR 50.54(m)(2)(i), and the CLB for the BVPS units. This change is designated administrative because it does not result in technical changes to the current TS.

- A.12 TS 6.6, “Reportable Event Action,” subsection 6.6.1 states, “The following actions shall be taken for REPORTABLE EVENTS: b. Each REPORTABLE EVENT shall be reviewed by the OSC, and the results of this review shall be submitted to the ORC.” This requirement statement is proposed to be removed from TSs.

This change is acceptable because this type of information is not necessary to be included in Technical Specifications to provide adequate protection of public health and safety. The description of the means by which the Onsite Safety Committee (OSC) and Corporate Nuclear Review Board (CNRB), which is the Offsite Review Committee (ORC) for BVPS, support the Technical Specifications and perform other tasks is contained in the UFSAR and other licensee controlled programs including the quality assurance program. Furthermore, this change is acceptable because these types of procedural details contained in the UFSAR and controlled programs are maintained pursuant to 10 CFR 50.59, which ensures changes are properly evaluated. Additionally, the ISTS do not include this requirement. This change is designated administrative because it does not result in technical changes to the current TS.

- A.13 TS 6.7, “Safety Limit Violation,” subsection 6.7.1, subpart a. states, “The facility shall be placed in at least HOT STANDBY within one (1) hour.” This requirement statement is proposed to be removed from TSs.

This change is acceptable because this action is redundant to action specified in Section 2.1, "Safety Limits," of the BVPS Unit Nos. 1 and 2 TSs. Additionally, this requirements is not contained in the Administrative Controls section of the ISTS. This change is designated administrative because it does not result in technical changes to the current TS.

- A.14 TS 6.7, "Safety Limit Violation," subsection 6.7.1, subpart b. states, in part, "The Safety Limit violation shall be reported ... to the plant manager and to the ORC within 24 hours." This requirement statement is proposed to be removed from TSs.

This change is acceptable because this type of information is not necessary to be included in Technical Specifications to provide adequate protection of public health and safety. The description of the means by which the CNRB and the plant manager support the Technical Specifications and perform other tasks is contained in the UFSAR and other licensee controlled programs including the quality assurance program. Furthermore, this change is acceptable because these types of procedural details contained in the UFSAR and controlled programs are maintained pursuant to 10 CFR 50.59, which ensures changes are properly evaluated. Additionally, the ISTS do not include this requirement. This change is designated administrative because it does not result in technical changes to the current TS.

- A.15 TS 6.7, "Safety Limit Violation," subsection 6.7.1, subpart c. states, "A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the On-Site Safety Committee (OSC). This report shall describe (1) the applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence." This requirement statement is proposed to be removed from TSs.

This change is acceptable because this type of information is not necessary to be included in Technical Specifications to provide adequate protection of public health and safety. The description of the means by which the OSC support the Technical Specifications and perform other tasks is contained in the UFSAR and other licensee controlled programs including the quality assurance program. Furthermore, this change is acceptable because these types of procedural details contained in the UFSAR and controlled programs are maintained pursuant to 10 CFR 50.59, which ensures changes

are properly evaluated. Additionally, the ISTS do not include this requirement. This change is designated administrative because it does not result in technical changes to the current TS.

- A.16 TS 6.7, "Safety Limit Violation," subsection 6.7.1, subpart d. states, in part, "The Safety Limit Violation Report shall be submitted to ... the ORC and the plant manager within 30 days of the violation." This requirement statement is proposed to be removed from TSs.

This change is acceptable because this type of information is not necessary to be included in Technical Specifications to provide adequate protection of public health and safety. The description of the means by which the CNRB and the plant manager support the Technical Specifications and perform other tasks is contained in the UFSAR and other licensee controlled programs including the quality assurance program. Furthermore, this change is acceptable because these types of procedural details contained in the UFSAR and controlled programs are maintained pursuant to 10 CFR 50.59, which ensures changes are properly evaluated. Additionally, the ISTS do not include this requirement. This change is designated administrative because it does not result in technical changes to the current TS.

- L.1 TS 6.2.2.c, is proposed to be amended to include the requirement statement that, "The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position."

The purpose of this new requirement statement is to provide wording consistent to that of the ISTS. The addition of this requirement statement also provides the same accommodation for unexpected absences contained in other subparts of Section 6 of TSs for radiation protection technicians. This proposed change is acceptable because it is consistent with the ISTS requirements and the NRC interpretation of implementing 10 CFR 50.54(m)(2)(i). Furthermore, this change is acceptable because these types of procedural details contained in controlled programs are maintained pursuant to 10 CFR 50.59, which ensures changes are properly evaluated. This change is less restrictive because it provides an accommodation of absence up to 2 hours that did not previously apply to the radiation protection technician position. However, the proposed change does not result in technical changes to the current TS.

- L.2 TS 6.2.2.f. is proposed to be redesignated TS 6.2.2.d and reworded to be consistent with the text of ISTS 5.2.2.d. TS 6.2.2.d is proposed to state the following:

“Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety related functions (e.g., licensed Senior Reactor Operators, licensed Reactor Operators, radiation control technicians, auxiliary operators, and key maintenance personnel).

The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.

Any deviation from the above guidelines shall be authorized in advance by the plant manager or the plant manager’s designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the working hour guidelines shall not be authorized.

Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned.”

The purpose of this new requirement statement is to provide wording consistent to that of the ISTS, although the proposed change removes specificity regarding the time constraints contained in the current TSs, and to retain the intent of the existing requirement. The requirements for the control of working hours for personnel performing safety-related functions is maintained through administrative procedures. This proposed change is acceptable because it is consistent with the ISTS requirements, the CLB for the BVPS units, and because this type of information is not necessary to be included in TSs to provide adequate protection of public health and safety. Furthermore, this change is acceptable because these types of procedural details contained in controlled programs are maintained pursuant to 10 CFR 50.59, which ensures changes are properly evaluated. This change is designated less restrictive because it removes specificity regarding the time constraints contained in the current TSs. However, the proposed change does not result in technical changes to the current TS.

D. SAFETY ANALYSIS

The proposed administrative changes to the TS index do not affect any TS requirements and will continue to ensure that the necessary plant equipment is operable in the plant conditions where these systems are required to operate to mitigate a DBA.

The administrative changes to Section 6 of the TSs are proposed to eliminate requirements that are redundant to those contained within Chapter 10, "Energy," of the Code of Federal Regulations (CFR) and to better align the BVPS TSs with the Westinghouse Improved Standard Technical Specifications (ISTS) guidance presented in NUREG-1431, Revision 2, issued by the NRC in April 2001.

The various administrative changes will continue to ensure that plant systems are available to support the assumptions of plant safety analysis and do not affect plant safety.

Therefore, based on the above, the changes to the TS index and to Section 6 of the TSs are considered safe.

E. NO SIGNIFICANT HAZARDS EVALUATION

The amendment requests administrative, editorial, and format changes to the technical specification (TS) index and the Administrative Controls section of TSs. Specifically, the amendment requests a relocation of the TS Bases page listings from the TS index to a TS Bases index, and removal of certain duplicative administrative requirements from Section 6, "Administrative Controls," of the TSs.

Relocation of the TS Bases page listings from the TS index to a TS Bases index is proposed in order to better facilitate control of the TS Bases under the Beaver Valley Power Station (BVPS) Bases Control Program. The BVPS Bases Control Program was reviewed and approved by the NRC through the issuance of Amendment Nos. 239 and 120, "Revised Thermal Design Procedure," dated July 20, 2001, for Unit Nos. 1 and 2, respectively.

Administrative changes to Section 6 of the TSs are proposed to eliminate requirements that are redundant to those contained within Chapter 10, "Energy," of the Code of Federal Regulations (CFR).

Other administrative changes to Section 6 of the TSs are proposed to better align the BVPS TSs with the Westinghouse Improved Standard Technical Specifications (ISTS) guidance presented in NUREG-1431, Revision 2, issued by the NRC in April, 2001.

The no significant hazard considerations involved with the proposed amendment have been evaluated. The evaluation focused on the three standards set forth in 10 CFR 50.92(c), as quoted below:

The Commission may make a final determination, pursuant to the procedures in paragraph 50.91, that a proposed amendment to an operating license for a facility licensed under paragraph 50.21(b) or paragraph 50.22 or for a testing facility involves no significant hazards consideration, if operation of the facility in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

The following evaluation is provided for the no significant hazards consideration standards.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

No. The proposed administrative changes to the TS index and to Section 6 of the TSs do not result in changes being made to structures, systems, or components (SSCs), or to event initiators or precursors. Also, the proposed changes do not impact the design of plant systems such that previously analyzed SSCs would now be more likely to fail. The initiating conditions and assumptions for accidents described in the Updated Final Safety Analysis Report (UFSAR) remain as previously analyzed. Thus, the proposed changes do not involve a significant increase in the probability of an accident previously evaluated.

The previously analyzed SSCs are unaffected by the proposed changes and continue to provide assurance that they are capable of performing their intended design function in mitigating the effects of design basis accidents (DBAs). As such, the consequences of accidents previously evaluated in the UFSAR will not be increased and no additional radiological source terms are generated. Therefore, there will be no reduction in the capability of those SSCs in limiting the radiological consequences of previously evaluated accidents and reasonable assurance that there is no undue risk to the health and safety of the public will continue to be provided. Thus, the proposed changes do not involve a significant increase in the consequences of an accident previously evaluated.

Therefore, the proposed administrative changes do not significantly increase the probability or consequences of any accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

No. The proposed administrative changes do not involve physical changes to analyzed SSCs or changes to the modes of plant operation defined in the technical specification. The proposed changes do not involve the addition or modification of plant equipment (no new or different type of equipment will be installed) nor do they alter the design or adversely affect operation of any plant systems. No new accident scenarios, accident or transient initiators or precursors, failure mechanisms, or limiting single failures are introduced as a result of the proposed changes.

The proposed administrative changes do not cause the malfunction of safety-related equipment assumed to be operable in accident analyses. No new or different mode of failure has been created and no new or different equipment performance requirements are imposed for accident mitigation. As such, the proposed changes have no effect on previously evaluated accidents.

Therefore, the proposed administrative changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the change involve a significant reduction in a margin of safety?

No. The proposed administrative changes do not affect any previously evaluated accident. The proposed changes do not adversely affect the TS requirements and will continue to ensure that the necessary plant equipment is operable in the plant conditions where these systems are required to operate to mitigate a DBA as described in the analyses presented in the UFSAR. Thus, the proposed administrative, editorial, and format changes do not affect plant safety.

Therefore, the proposed administrative changes do not involve a significant reduction in a margin of safety.

F. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission has provided guidance concerning the application of standards in 10 CFR 50.92 by providing certain examples (March 6, 1986 51FR7751) of amendments that are considered not likely to involve a significant hazards consideration. The proposed amendment is consistent with examples where there is no impact on previously analyzed accidents in the current licensing and design basis of the facility.

Based on the considerations expressed in this application for license amendment, it is concluded that the activities associated with this license amendment request satisfy the requirements of 10 CFR 50.92(c) and, accordingly, a no significant hazards consideration finding is justified.

G. ENVIRONMENTAL CONSIDERATION

This license amendment request changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. It has been determined that this license amendment request involves no significant increase in the amounts, and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. This license amendment request makes changes only to administrative procedures or requirements. The category of this licensing action does not individually or cumulatively have a significant effect on the human environment. Accordingly, this license amendment request meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no

environmental impact statement or environmental assessment need be prepared in connection with the issuance of this license amendment request.