

ATTACHMENT A

1. Remove pages 3/4 3-34, 3/4 3-35, 3/4 3-36, B 3/4 3-2.
2. Insert pages 3/4 3-34, 3/4 3-34a, 3/4 3-35, 3/4 3-36, 3/4 3-36a, B 3/4 3-2.

TABLE 3.3-6

RADIATION MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABLE MODES</u>	<u>SETPOINT#</u>	<u>MEASUREMENT RANGE</u>	<u>ACTION</u>
1. AREA MONITORS					
a. Fuel Storage Pool Area (RM-207)	1	*	≤ 15 mR/hr	$10^{-1} - 10^4$ mR/hr	19
b. Containment					
i. Purge & Exhaust Isolation (RMVS 104 A & B)	1	6	$\leq 1.6 \times 10^3$ cpm	$10 - 10^6$ cpm	22
ii. Area (RM-RM-219 A & B)	2	1, 2, 3, & 4	≤ 30 R/hr	$1 - 10^7$ R/hr	36
2. PROCESS MONITORS					
a. Containment					
i. Caseous Activity					
Purge & Exhaust					
Isolation (RM-215B)	1	6	$\leq 7.3 \times 10^2$ cpm	$10 - 10^6$ cpm	22
RCS Leakage Detection (RM 215B)	1	1, 2, 3, & 4	N/A	$10 - 10^6$ cpm	20
ii. Particulate Activity					
Purge & Exhaust					
Isolation (RM 215A)	1	6	$\leq 2.5 \times 10^5$ cpm	$10 - 10^6$ cpm	22
RCS Leakage Detection (RM 215A)	1	1, 2, 3, & 4	N/A	$10 - 10^6$ cpm	20
b. Fuel Storage Building	1	**	$\leq 4.0 \times 10^4$ cpm	$10 - 10^6$ cpm	21
Gross Activity (RMVS - 103 A & B)					

* With fuel in the storage pool or building

* With irradiated fuel in the storage pool

Above background

TABLE 3.3-6 (Continued)

RADIATION MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABLE MODES</u>	<u>SETPOINT#</u>	<u>MEASUREMENT RANGE</u>	<u>ACTION</u>
PROCESS MONITORS (Continued)					
c. Noble Gas Effluent Monitors					
i. Supplementary Leak Collection and Release System (RM-VS-110 Ch. 7 & Ch. 9) ***	1	1, 2, 3, & 4	$\leq 3.5 \times 10^2$ cpm	$10^{-2} - 10^5$ uCi/cc*	36
ii. Auxiliary Building Ventilation System (RM-VS-109 Ch. 7 & Ch. 9) ***	1	1, 2, 3, & 4	$\leq 2.75 \times 10^2$ cpm	$10^{-2} - 10^5$ uCi/cc*	36
iii. Process Vent System (RM-CW-109 Ch. 7 & Ch. 9) ***	1	1, 2, 3, & 4	$\leq 1.8 \times 10^4$ cpm	$10^{-2} - 10^5$ uCi/cc**	36
iv. Atmospheric Steam Dump Valve and Code Safety Relief Valve Discharge (RM-MS-100 A, B, C)	1/S.G	1, 2, 3, & 4	$\leq 5.0 \times 10^1$ cpm	$10^{-1} - 10^3$ uCi/cc	36
v. Auxiliary Feedwater Pump Turbine Exhaust (RM-MS-101)	1	1, 2, 3, & 4	$\leq 6.5 \times 10^2$ cpm	$10^{-1} - 10^3$ uCi/cc	36

* Nominal range for Ch. 7 and Ch. 9. Alarm set on Ch. 7

** Nominal range for Ch. 7 and Ch. 9. Alarm set on Ch. 9

*** Other SPING-4 channels not applicable to this specification

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TABLE 3.3-6 (Continued)

TABLE NOTATION

- | | | |
|-----------|---|--|
| ACTION 19 | - | With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, perform area surveys of the monitored area with portable monitoring instrumentation at least once per 24 hours. |
| ACTION 20 | - | With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.4.6.1. |
| ACTION 21 | - | With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, comply with the applicable ACTION requirements of Specifications 3.9.12 and 3.9.13. |
| ACTION 22 | - | With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.9.9. |
| ACTION 36 | - | <p>With the number of OPERABLE channels less than required by the Minimum Channels OPERABLE requirement, either restore the inoperable Channel(s) to OPERABLE status within 72 hours,
or:</p> <ol style="list-style-type: none"> 1) Initiate the preplanned alternate method of monitoring the appropriate parameter(s), and 2) Prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 14 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status. |

TABLE 4.3-3

RADIATION MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INSTRUMENT	CHANNEL CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODES IN WHICH SURVEILLANCE REQUIRED
1. AREA MONITORS				
a. Fuel Storage Pool Area (RM 207)	S	R	M	*
b. Containment				
i. Purge & Exhaust Isolation (RMVS 104 A & B)	S	R	M	6
ii. Area (RM-RM-219 A & B)	S	R	M	1, 2, 3, & 4
2. PROCESS MONITORS				
a. Containment				
i. Gaseous Activity				
Purge & Exhaust Isolation (RM 215B)	S	R	M	6
RCS Leakage Detection (RM 215B)	S	R	M	1, 2, 3, & 4
ii. Particulate Activity				
Purge & Exhaust Isolation (RM 215A)	S	R	M	6
RCS Leakage Detection (RM 215A)	S	R	M	1, 2, 3, & 4
b. Fuel Storage Building Gross Activity (RMVS 103 A & B)	S	R	M	**

* With fuel in the storage pool or building

** With irradiated fuel in the storage pool

TABLE 4.3-3 (Continued)

RADIATION MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>INSTRUMENT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>CHANNEL FUNCTIONAL TEST</u>	<u>MODES IN WHICH SURVEILLANCE IS REQUIRED</u>
PROCESS MONITORS (Continued)				
c. Noble Gas Effluent Monitors				
i. Supplementary Leak Collection and Release System (RM-VS-110 Ch. 7 & Ch. 9)	S	R	M	1, 2, 3, & 4
ii. Auxiliary Building Ventilation System (RM-VS-109 Ch. 7 & Ch. 9)	S	R	M	1, 2, 3, & 4
iii. Process Vent System (RM-GW-109 Ch. 7 & Ch. 9)	S	R	M	1, 2, 3, & 4
iv. Atmospheric Steam Dump Valve and Code Safety Relief Valve Discharge (RM-MS-100 A, B, C)	S	R	M	1, 2, 3, & 4
v. Auxiliary Feedwater Pump Turbine Exhaust (RM-MS-101)	S	R	M	1, 2, 3, & 4

BEAVER VALLEY - UNIT 1

3/4 3-36a

Proposed wording

INSTRUMENTATION

BASES

3/4.3.3 MONITORING INSTRUMENTATION

3/4.3.3.1 RADIATION MONITORING INSTRUMENTATION

The OPERABILITY of the radiation monitoring channels ensures that:

- 1) the radiation levels are continually measured in the areas served by the individual channels; 2) the alarm or automatic action is initiated when the radiation level trip setpoint is exceeded; and 3) sufficient information is available on selected plant parameters to monitor and assess these variables following an accident. This capability is consistent with the recommendations of NUREG-0737, "Clarification of TMI Action Plan Requirements," October, 1980.

3/4.3.3.2 MOVABLE INCORE DETECTORS

The OPERABILITY of the movable incore detectors with the specified minimum complement of equipment ensures that the measurements obtained from use of this system accurately represent the spatial neutron flux distribution of the reactor core. The OPERABILITY of this system is demonstrated by irradiating each detector used and determining the acceptability of its voltage curve.

For the purpose of measuring $F_0(Z)$ or $F_{\Delta H}^N$, a full incore flux map is used. Quarter-core flux maps, as defined in WCAP-8648, June 1976, may be used in recalibration of the excore neutron flux detection system, and full incore flux maps or symmetric incore thimbles may be used for monitoring the Quadrant Power Tilt Ratio when one Power Range Channel is inoperable.

3/4.3.3.3 SEISMIC INSTRUMENTATION

The OPERABILITY of the seismic instrumentation ensures that sufficient capability is available to promptly determine the magnitude of a seismic event and evaluate the response of those features important to safety. This capability is required to permit comparison of the measured response to that used in the design basis for the facility and is consistent with the recommendations of Regulatory Guide 1.12, "Instrumentation for Earthquakes."

3/4.3.3.4 METEOROLOGICAL INSTRUMENTATION

The OPERABILITY of the meteorological instrumentation ensures that sufficient meteorological data is available for estimating potential radiation doses to the public as a result of routine or accidental release of radioactive materials to the atmosphere. This capability is required to evaluate the need for initiating protective measures to protect the health and safety of the public and is consistent with the recommendations of Regulatory Guide 1.23, "Onsite Meteorological Programs."

ATTACHMENT B

This safety evaluation applies to the proposed revisions to the Beaver Valley Power Station, Unit No. 1 Technical Specifications, Appendix A, Section 3.3.3.1, Radiation Monitoring. These changes are required as a result of the implementation of NUREG-0737 Items II.F.1.1, II.F.1.2, and II.F.1.3. The applicable plant modifications were incorporated by DCP 303, Containment and Effluent Radiation Monitors. The required revisions to the Technical Specification include:

- a) Table 3.3-6, Radiation Monitoring Instrumentation was expanded to include the high range containment area radiation monitors (RM-RM-219A,B) and the noble gas effluent monitors (RM-VS-110; RM-VS-109; RM-GW-109; RM-MS-100A,B, and C; RM-MS-101). Action statement 36 was included and is applicable to the above monitors.
- b) Table 4.3-3, Radiation Monitoring Instrumentation Surveillance Requirements, was expanded to include applicable surveillance requirements for the monitors listed in a).
- c) The BASES for Section 3.3.3.1 were revised to reflect the additional capability to monitor selected plant areas and process systems afforded by the new monitors and to indicate that this capability is responsive to the recommendations of NUREG-0737.

The above changes are stated as required by NUREG-0737 and the specific requirements are consistent with the Westinghouse Standard Technical Specifications; NUREG-0452, Revision 4. The applicable portions of this document were forwarded to us for use in preparation of this proposed change by NRC letters dated October 7, 1981, and November 6, 1981. The October 7, 1981, letter included Section 3.3.3.1 for incorporation into our Technical Specifications, our present Technical Specifications have this section and the wording is identical, therefore, this section was not included in this proposed change.

The FSAR was reviewed and it was determined that FSAR update will be required to incorporate the DCP 303 design modifications. FSAR Sections 9.13 Ventilation Systems, 11.3.3 Process and Effluent Radiological Monitoring System, 11.3.4 Area Radiation Monitoring System, Table 11.3-2, Table 11.3-3, Figure 11.2-2 and Figure 5.1.1 will be revised in 1983 to include the applicable monitors. The accident analyses in Section 14 were reviewed as to possible impact from these proposed Technical Specification changes. The applicable sections are 14.2.1 Fuel Handling Accident, 14.2.3 Accidental Release of Waste Gases, 14.2.4 Steam Generator Tube Rupture and 14.3 Loss of Coolant Accident. Neither the probability of these occurrences nor the consequences of these postulated accidents will be increased due to the addition of the new monitors into the Technical Specifications.

Rather, the new monitors will provide additional information to the operators concerning concentrations and dispersions of radioactivity that would result from these postulated events and better enable the operator to maintain the resultant offsite dosages to within the prescribed limits of 10 CFR 100.

The addition of the high range containment area radiation monitors and the noble gas radiation monitors into Table 3.3-6, Radiation Monitoring Instrumentation, will not create the possibility for an accident or malfunction of safety related equipment of different types than previously evaluated in the FSAR. The new monitors provide additional information about existing plant areas and equipment and appropriate safeguards were implemented which separated and isolated or protected existing safety related equipment to prevent any adverse interactions of the new and existing equipment which could create the possibility of a new type of malfunction. The additional information available to the operator from the radiation monitors through the attendant control terminals, readout displays and microprocessors in the control room will better enable the operator to be aware of changing plant conditions and respond in an appropriate manner. The alarm setpoints were selected such that they correspond to site area emergency or general emergency criteria, thereby preventing spurious alarms which might cause the operator to react erroneously or creating the possibility of a new type of accident occurring. Therefore, this proposed Technical Specification change does not represent an unreviewed safety question.

The incorporation of the additional monitors into Table 3.3-6 and Table 4.3-3 will not affect the margin of safety as defined in the bases to Appendix A, B 3/4 3.3.1, Radiation Monitoring Instrumentation and Appendix B Environmental Technical Specifications, Section 2.4.3 and Section 2.4.4. The new monitors do not diminish the capability of the existing radiation monitoring systems to continuously monitor radiation levels and initiate appropriate alarms or automatic actions when the applicable radiation level trip setpoints are exceeded. The proposed revisions to the bases to reflect the new capability to monitor additional selected plant parameters and assess these variables after an accident clearly indicates that the margin of safety has been improved by the incorporation of the new monitors into the Technical Specifications.

The OSC and the ORC have reviewed this proposed change and based on the above safety evaluation, it is concluded there is reasonable assurance that the public health and safety will not be endangered by operation in the proposed manner.