ATTACHMENT A

Beaver Valley Power Station, Unit No. 2
Proposed Technical Specification Change No. 87

The following is a list of the affected page:

Affected Page: 3/4 6-13

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (continued)

d. At least once per 18 months, during shutdown, by verifying, that on recirculation flow, each recirculation spray pump develops a differential pressure of ≥ 112 psid at a flow of ≥ 3500 gpm.* (1)

e. At least once per 18 months during shutdown, by:

1. Cycling each power operated (excluding automatic) valve in the flow path not testable during plant operation, through at least one complete cycle of full travel.

2. Verifying that each automatic valve in the flow path actuates to its correct position on a test signal.* DELETE

3. Initiating flow through each Service Water subsystem and its two associated recirculation spray heat exchangers, and verifying a flow rate of at least 11,000 gpm.

f. At least once per 5 years by performing an air or smoke flow test through each spray header and verifying each spray nozzle is unobstructed.

ADD

(1) Until the beginning of the fifth refueling outage (Mode 5) or until an outage of an expected duration of 30 days or greater, whichever occurs first, 2RSS-P21A recirculation spray pump is only required to develop a differential pressure of ≥ 110 psid at a flow of ≥ 3275 gpm.

~~*The specified 18 month surveillance interval during the first fuel cycle may be extended to coincide with completion of the first refueling outage.~~

DELETE

(Proposed Wording)

ATTACHMENT B

Beaver Valley Power Station, Unit No. 2
Proposed Technical Specification Change No. 87
REVISION OF SURVEILLANCE REQUIREMENT 4.6.2.2.d

A. DESCRIPTION OF AMENDMENT REQUEST

The proposed change would revise Surveillance Requirement (SR) 4.6.2.2.d of Limiting Condition For Operation (LCO) 3.6.2.2 titled "Containment Recirculation Spray System." The specific revision would be to add a new footnote designated by the number one (1) which would state the following: "Until the beginning of the fifth refueling outage (Mode 5) or until an outage of an expected duration of 30 days or greater, whichever occurs first, 2RSS-P21A recirculation spray pump is only required to develop a differential pressure of $\geq$ 110 psid at a flow of $\geq$ 3275 gpm."

In addition, SR 4.6.2.2.e.2 would be revised by deleting the footnote denoted by a single asterisk. This footnote pertains to an extension to the 18 month surveillance interval for the first fuel cycle. Since Beaver Valley Power Station (BVPS) Unit No. 2 is currently in the fifth fuel cycle, this footnote is no longer applicable.

B. BACKGROUND

On August 15, 1994, BVPS Unit No. 2 requested and received enforcement discretion from meeting the requirements of LCO 3.6.2.2 action statement "a." This action statement requires that with one containment recirculation spray subsystem inoperable, both spray subsystems must be restored to operable status within 72 hours or the plant must be in Hot Standby within the next 6 hours. If both spray subsystems are not restored to operable status within the next 48 hours, the plant must be placed in Cold Shutdown within the next 30 hours.

Recirculation spray system (RSS) pump 2RSS*P21A was declared inoperable at 3:15 P.M. on August 12, 1994, because it was determined that the pump could not meet the requirements of SR 4.6.2.2.d. This surveillance requires that the pump develop on recirculation flow a differential pressure of equal to or greater than 112 psid at a flow of equal to or greater than 3500 gpm.

The inability of 2RSS*P21A pump to meet SR 4.6.2.2.d was discovered during the process of evaluating the past RSS pump performance. It was observed that the 2RSS*P21A pump flow element 2RSS*FE157A certified calibration report predicted a flow of 3850 gpm at 100 inches of water column (wc) differential while the flow transmitter 2RSS*FT157A was calibrated to indicate 4000 gpm at 100 inches wc. This calibration mismatch is unaccounted for in the test loop analysis. The result is that flows recorded during surveillance testing would be non-conservatively measured. Corrections of the calibration mismatch has resulted in a revised predicted flow of approximately 3388 gpm at 112.8

psid for 2RSS*P21A pump, which, when compared to the pump performance curve, was determined to be less than the technical specification required flow.

The function of the RSS pumps is to take suction from the containment sump and discharge to the spray rings located in the containment dome during a Design Basis Accident (DBA). This provides cooling inside containment and will maintain a subatmospheric containment for the duration of the accident. The containment is initially brought to a subatmospheric condition utilizing the quench spray system and the recirculation spray system following transfer to recirculation; the recirculation spray system will then maintain the containment subatmospheric.

In order to test the recirculation spray pumps, a temporary dike must be installed in the lowest floor elevation of containment around the safeguards sump area, which contains the suction piping for all four RSS pumps, to ensure adequate net positive suction head (NPSH) for each pump. A test loop is provided from the discharge of each pump back to the sump area in containment. This alignment is accomplished by placing the four RSS header spectacle flanges into the "no flow" position, and by removing blind flanges and installing the temporary strainer spoolpiece housings into the recirculation test loop flow path to divert flow back to the containment sump.

The flow path used to test 2RSS*P21A can be seen on Figure 1 (Page B-13) and is described as follows: The RSS pump 2RSS*P21A (located outside containment) takes suction from the temporary dike (located inside containment) through the suction MOV [2RSS*MOV155A] then discharges flow through flow element [2RSS*FE157A], heat exchanger [2RSS*E21A], discharge MOV [2RSS*MOV156A], discharge check valve [2RSS*29], spoolpiece housing [2RSS-STRT249], throttle valve [2RSS-125], and finally through restricting orifice [2RSS-102A] back to the temporary dike around the containment sump. The restricting orifice provides a flow of approximately 3500 gpm (the current minimum technical specification required flow). In order to meet or exceed the minimum technical specification required flow, an additional mini-recirculation flow path is valved in to provide a total throttled reference flow between 3500-3550 gpm as required by the ASME XI Inservice Test (IST) Program. This flow path is provided through valves [2RSS*27 and 5] from the pump discharge back to the suction of the 2RSS*P21A pump.

C. JUSTIFICATION

The proposed deletion of the footnote pertaining to extending the 18 month surveillance interval for the first fuel cycle is editorial in nature and does not affect plant safety. BVPS Unit No. 2 is currently in its fifth fuel cycle. Therefore, this footnote is no longer applicable and can be removed.

The proposed change to SR 4.6.2.2.d is necessary since the 2RSS*P21A pump cannot be tested or repaired, if necessary, during plant operation. It is impractical to install the temporary dike in the containment sump which is necessary to run the RSS pumps on recirculation flow. If the temporary dike would be installed, it would obstruct the containment sump inventory during a DBA from reaching the suction of the pumps, thus rendering all RSS pumps incapable of fulfilling their safety function. This concern of testing the RSS pumps at power is reflected in the existing IST Pump Relief Request No. 2.

Following testing, any necessary repairs that might be required which could involve removing the pump rotating element would be highly involved. The pump is a deep draft vertical design and its removal would require use of a crane located outside of the safeguards building. The approximate length of the pump from the impeller to the centerline of the discharge flange is 68 ft. Therefore, it is impracticable to restore 2RSS*P21A pump performance to meet the current surveillance requirement values until the plant is shutdown for a refueling outage or for some other outage of sufficient duration.

The proposed pump performance values of developed differential pressure and flow for 2RSS*P21A were developed using the following methodology.

The LOCTIC containment analysis at various cases was utilized in order to provide the bounding conditions of the Safety Analysis for the degraded condition of the expected performance of 2RSS*P21A. For all the cases described below, there are additional margins that ensure the transient analysis results for this RSS subsystem would be conservative. These margins include:

- The use of the minimum sump temperature for the RSS heat exchanger inlet temperature which results in a minimum overall heat transfer coefficient (Uo). This is only done for the heat exchanger performance evaluation. We then use this artificially lower Uo as an input to LOCTIC which then maximizes RSS spray temperature.

- The sump elevation is also taken at the minimum, rather than taking credit for the sump volume build-up as the transient progresses. This reduces the NPSH available and hence the RSS pump flow.

- The design fouling (0.0003) is utilized for the RSS heat exchanger performance evaluation as an input to the analysis.

- The Service Water System (SWS) flow for the tube side of the RSS heat exchanger is taken at the minimum requirement of 5500 gpm per heat exchanger. Plant testing has shown that the actual flows are higher than these flows.

The following are a summary of the three cases run on the LOCTIC program for this elevation:

CASE 1:

This evaluation consisted of calculating the respective RSS heat exchanger performance for the as found degraded data for 2RSS*P21A and then establishing the containment transient for the as found case. This case included the following modification to the original design basis calculation:

- The tube plugging in 2RSS*E21A is taken at the actual 28 tubes plugged for the heat exchanger rather than the theoretical limit of 100 tubes plugged.

- The flow for the RSS pump is taken at 3395 gpm (this is 5 gpm below the 3400 gpm value calculated from applying the as found venturi bias onto the original design basis flow value to the spray nozzles of 3440 gpm). Note that the values of the 2RSS*P21A pump flow found during IST recirculation testing is corrected to 3388 gpm but that the expected full spray header flow to the spray nozzles would correspond to the value of 3395 gpm.

- The Service Water temperature is taken at the design basis of 89°F.

  Results from CASE 1 show a subatmospheric peak of -0.02 psig (Acceptance Criteria: < 0.0 psig) and a depressurization time of 3460 seconds (Acceptance Criteria: < 3600 seconds). This concludes that the 2RSS*P21A pump will perform its intended safety function if called upon during a containment isolation phase B (CIB).

CASE 2:

This evaluation is performed to show the sensitivity of the containment subatmospheric peak for various relevant river water temperatures at a RSS pump flow of 3375 gpm for 2RSS*P21A. Three runs were done on LOCTIC. The following is a summary of those results (the tube plugging level for the "A" RSS heat exchanger is still taken at 28 actual tubes plugged):

SWS Temp.	Sub. Atmos. Peak	"A" RSS Flow
85°F	-0.27 psig	3375 gpm
80°F	-0.57 psig	3375 gpm
75°F	-0.86 psig	3375 gpm

CASE 3:

This evaluation is similar to CASE 2 but at a further reduced "A" RSS flow of 3285 gpm.

SWS Temp.	Containment Temp.	Sub. Atmos. Peak	"A" RSS Flow
88°F	≥ 100°F	0.00 psig	3285 gpm
87°F	≥ 100°F	-0.07 psig	3285 gpm
86°F	≥ 85°F	-0.05 psig	3285 gpm
80°F	≥ 85°F	-0.42 psig	3285 gpm
75°F	≥ 85°F	-0.71 psig	3285 gpm

Conclusion for CASE 2 and 3: Decreasing the design basis river temperature provides considerable benefit to the containment analysis for this RSS pump condition. The use of a maximum river temperature lower than the 89°F design basis is realistic considering that the hottest daily average temperature for the season appears to have passed (present temperature is approximately 75°F). In all cases, the time to fully depressurize containment is less than the maximum of 3600 seconds (1 hour).

For CASE 2, with a lower flow of 3375 gpm for 2RSS*P21A pump, a river temperature of 85°F provides for an increase in subatmospheric peak margin of over 13 times what is calculated in CASE 1 (-0.27 versus -0.02 psig).

For CASE 3, the use of a larger flow margin (3285 gpm as compared to the present tested pump data for 2RSS*P21A) results in only a two degree decrease in the river temperature requirement (87°F) to maintain subatmospheric conditions post CIB.

The following provides a tabulation of relevant flow values for 2RSS*P21A pump:

	Flow	ΔP
- As Found Test Condition (2R4 Data)	3512 gpm	112.8 psid
- Corrected Test Condition (Note 2)	3388 gpm	112.8 psid
- Present TS 3.6.2.2 (Note 1)	≥3500 gpm	≥112.0 psid
- Proposed New TS 3.6.2.2 (Applicable to 2RSS*P21A Only) (Maximum SWS Temperature ≤ 87°F) (Note 3)	≥3275 gpm	≥110.0 psid

	Flow	# Heat Exchanger Tubes Plugged
- Original Design Basis (89°F Maximum SWS) (Note 1)	3440 gpm	100 (Theoretical)
- Corrected "As Found" Safety Analysis (SWS Temperature = 89°F) (Note 2)	3395 gpm	28 (Actual 2R4)
- New Design Basis Safety Analysis (SWS Temperature = 87°F) (Note 3)	3285 gpm	28 (Actual 2R4)

Note 1: The original design basis analysis correlates with the present surveillance requirements of SR 4.6.2.2.d.

Note 2: The corrected "as found" values from the 2R4 data were used as inputs for the corrected safety analysis values. The results of this analysis proved that the present pump would fulfill its intended safety function when actual tube plugging levels were taken into account.

Note 3: The new design basis containment safety analysis (at present RSS heat exchanger tube plugging levels and reduced river water maximum temperature of 87°F) corresponds with the proposed technical specification values for flow and differential pressure.

As shown by the results for Case 3 which utilized the proposed technical specification value of $\geq$ 3275 gpm for 2RSS*P21A pump on recirculation flow as inputs, the containment will return to a subatmospheric condition within one hour following a DBA and remain subatmospheric for the duration of the accident. The new analysis also provides additional margin between actual pump performance and assumed pump performance, i.e., 3388 gpm (actual) versus 3275 gpm (assumed). The inputs into this evaluation which include assumptions that the "A" RSS heat exchanger will remain at the current plugging level of 28 tubes and the SWS temperature is less than or equal to 87°F can be assured by the current RSS heat exchanger status and revisions to the plant operating logs until the fifth refueling outage.

The recirculation spray system heat exchangers are currently in dry lay-up and will remain in dry lay-up for the remainder of Cycle 5 operation. There are no current plans to increase the number of tubes plugged in the recirculation spray heat

exchangers during the remainder of Cycle 5 operation. Plugging, if needed, normally occurs following tube inspections conducted during refueling outages.

The recorded river water temperature during the week of August 15 was approximately 75°F and has been trending downward due to cooler average daily temperatures and recent precipitation.

The river water temperature reached a maximum value of 83°F in 1994 and the site maximum temperature of 86°F was recorded in 1988.

The river water temperature is currently verified acceptable as less than 87°F per Log L-5 Item #89. Technical Specification 4.7.5.1 requires verifying an average river water temperature of below 89°F once per 24 hours. Log L-5 has been revised to include a note that would require containment temperature to be maintained equal to or greater than 100°F at a service water temperature of $\geq$ 86°F and 2RSS*P21A pump to be declared inoperable should the river water temperature exceed 87°F.

Therefore, the proposed change to SR 4.6.2.2.d for RSS pump 2RSS*P21A can be justified for the maximum duration until the fifth refueling outage due to the special test configuration required to perform SR 4.6.2.2.d, the pump design, and special considerations to perform any necessary repairs if required which prohibit returning 2RSS*P21A pump performance back to current technical specification limits without significant outage duration. The recirculation spray system analysis has been re-evaluated with the reduced pump performance characteristics, i.e., actual and proposed flow and head values, for 2RSS*P21A pump and continues to show acceptable results for containment depressurization time and subatmospheric peak pressure with additional plant operating restrictions. The current RSS heat exchanger status and the revised operating Log L-5 will ensure that these additional analysis restrictions, i.e., SWS temperature and "A" RSS heat exchanger plugging limit, will remain valid until the performance of 2RSS*P21A pump can be restored to the currently required technical specification limits at the next available outage of sufficient duration.

D. SAFETY ANALYSIS

The proposed reduction in the performance requirements for 2RSS*P21A pump does not affect the containment peak pressure for a loss of coolant accident (LOCA). The containment peak pressure occurs prior to the initiation of quench spray. Since recirculation spray is initiated after quench spray, changing its performance requirements will not affect containment peak pressure. Recirculation spray performance does, however, affect

the capability to depressurize the containment following an accident. Specifically, the time to obtain a subatmospheric condition and the subatmospheric peak pressure are directly affected due to changes in recirculation spray system performance.

The proposed reduction in the required performance for 2RSS*P21A pump and its affect on recirculation spray system performance has been evaluated using the LOCTIC computer code. This analysis was performed using the proposed performance requirements for 2RSS*P21A pump on recirculation flow as an input. The results of this analysis demonstrated that the design basis requirement for the containment depressurization system continues to be met with the proposed performance requirements for 2RSS*P21A pump and maximum SWS temperature of 87°F. This analysis also assumes the current plugging level of 28 tubes in "A" RSS heat exchanger. With the above mentioned analysis inputs, the containment depressurization system continues to be capable of reducing the containment pressure to a subatmospheric condition within one hour following a LOCA and maintaining the containment pressure subatmospheric for the long term. The current analysis requirements of a containment depressurization time of less than 3600 seconds and a subatmospheric peak pressure of less than 0.0 psig continue to be met. The containment depressurization time increased by approximately 10 seconds (3440 seconds to 3450 seconds) as a result of the revised inputs. The subatmospheric peak pressure decreased by approximately .04 psig (-.03 psig to -.07 psig).

Since the acceptance criteria for the containment depressurization system continue to be met and the containment peak pressure remains unchanged, the ability of the containment structure to restrict the release of fission products to the environment following a LOCA remains unchanged. The increased containment depressurization time does not affect the calculated offsite dose consequences since the release is assumed to occur for one hour following a LOCA. The revised depressurization time of 3450 seconds is less than the assumed 3600 second depressurization time. In addition, the revised pump performance parameters for 2RSS*P21A pump used in the new analysis provides margin between actual pump performance and assumed pump performance, i.e., 3388 gpm at 112.8 psid versus 3275 gpm at 110 psid. The remaining three RSS pumps currently meet the required technical specification performance parameters. Four separate and independent RSS subsystems will continue to be available to mitigate the consequences of a DBA.

Therefore, the proposed change is considered safe based on the fact that the containment depressurization system will continue to meet its design basis requirements. The proposed change will not impose additional challenges to the containment structure in

terms of peak pressure. The calculated offsite dose consequences of a DBA will remain unchanged since the assumed one hour release duration remains unchanged. There is margin between actual pump performance and assumed pump performance which adds conservatism to the calculated containment depressurization performance.

E. NO SIGNIFICANT HAZARDS EVALUATION

The no significant hazard considerations involved with the proposed amendment have been evaluated, focusing 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?

   The proposed change will revise the operability criteria for recirculation spray pump 2RSS*P21A. The differential pressure and flow requirements are being revised to account for a change in pump performance. The recirculation spray system (RSS) is designed to assist the quench spray system in returning the containment to subatmospheric conditions following a Design Basis Accident (DBA) and then maintaining a subatmospheric containment for the duration of accident mitigation and recovery.

   The change in operability criteria does not result in a modification to plant equipment nor does it affect the manner in which the plant is operated. The change establishes new acceptance criteria for determining pump operability. This equipment is normally in a standby

condition and only operates during accident mitigation. Since the physical plant equipment and operating practices are not changed, and this equipment is normally in a standby configuration, there is no change in the probability of an accident previously evaluated.

Changing the operating criteria was evaluated against the DBA safety analysis. The 2RSS*P21A recirculation spray pump will provide less flow than previously analyzed. This pump characteristic was evaluated by examining the LOCTIC containment analysis to determine if sufficient cooling would still be provided to demonstrate that previous accident consequences remain unchanged. Actual heat exchanger tube plugging levels versus assumed end of life conditions were utilized and the evaluation demonstrated that the containment returns to subatmospheric pressure following a DBA within previously approved analysis results. This continues to demonstrate that the consequences of an accident are unchanged since any potential release from containment is terminated within existing accident analysis assumptions.

In order to provide additional pump operating margin, the evaluation was redone assuming a lower flow and a reduced river water temperature. River water provides the ultimate heat sink source at Beaver Valley. The design basis river water temperature was reduced for the evaluation; however, the temperature assumed remains above the highest river water temperature recorded at the site. The results of this evaluation demonstrate that at actual heat exchanger conditions, reduced river water flow through the recirculation spray heat exchanger and at a slightly reduced river water temperature, the containment returns to subatmospheric pressure within the current accident analysis assumptions of one hour. This again demonstrates that the consequences of an accident previously evaluated remains unchanged since there is no change to assumptions regarding releases from containment.

One editorial change is also included which deletes a footnote which provided a schedule extension for completing a specific refueling frequency surveillance during the first refueling outage. Since this has been completed, this footnote is no longer needed.

Based on the above discussion, it is concluded that this change will not increase the probability or consequences of an accident previously evaluated due to revising the 2RSS*P21A recirculation spray pump performance criteria.

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

   The proposed change does not alter the method of operating the plant. The recirculation spray system is an accident mitigation system and is normally in standby. System operation would be initiated following a containment pressure increase resulting from a DBA. A revision to the 2RSS*P21A pump operating criteria has been shown to continue to provide sufficient flow to mitigate the consequences of a DBA. RSS operation continues to fulfill the safety function for which it was designed and no changes to plant equipment or operating procedures will occur. As a result, an accident which is different than any already evaluated in the Updated Final Safety Analysis Report will not be created due to this change.

   The removal of the footnote is editorial and eliminates a previously granted schedular extension which is no longer applicable.

   Therefore, the proposed change does 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?

   It has been demonstrated that the proposed change will not affect the ability of the RSS from performing its safety function. This proposed change to reduce the flow requirements associated with the "A" train recirculation spray subsystem inherently results in some reduction in system performance. However, overall plant safety margin is not affected.

   The evaluation shows that the return to subatmospheric pressure will take approximately 10 seconds longer than previously demonstrated. The design bases for the containment depressurization system is for containment to be restored to subatmospheric conditions within one hour following a DBA.

   This design requirement is still being satisfied. There is no resultant change in dose consequences related to the increased time to reach subatmospheric pressure.

   The surveillance requirements for demonstrating the RSS is operable will continue to assure the ability of the system to satisfy its design function. Daily monitoring of river water temperatures, as currently done, assures the

evaluation assumptions will continue to be met while the plant is operating. The assumed river water temperature is greater than the highest recorded temperature at Beaver Valley; therefore, margin to design basis conditions is not affected.

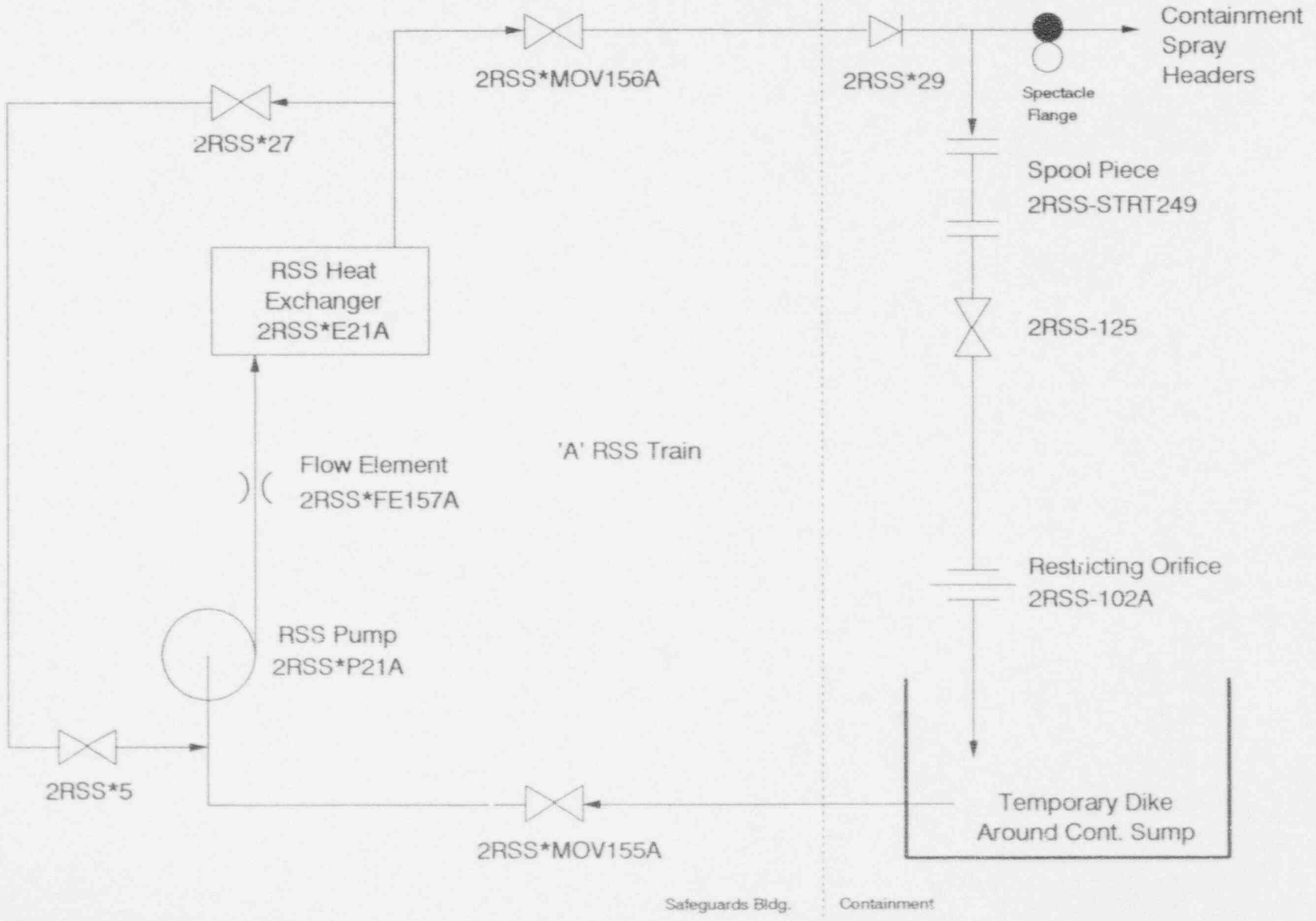
The removal of the schedular extension from the surveillance requirement is editorial since it is no longer applicable.

Therefore, based on the above discussion, it can be concluded that the proposed change does not involve a significant reduction in a margin of safety.

F. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

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

RSS Test Configuration



ATTACHMENT C

Beaver Valley Power Station, Unit No. 2
Proposed Technical Specification Change No. 87

Applicable Typed Page

ATTACHMENT TO LICENSE AMENDMENT NO. _____

FACILITY OPERATING LICENSE NO. NPF-73

DOCKET NO. 50-412

Replace the following page of Appendix A, Technical Specifications, with the enclosed page as indicated. The revised page is identified by amendment number and contains vertical lines indicating the areas of change.

Remove	Insert
3/4 6-13	3/4 6-13

(Proposed Wording)

SURVEILLANCE REQUIREMENTS (continued)

d. At least once per 18 months, during shutdown, by verifying, that on recirculation flow, each recirculation spray pump develops a differential pressure of ≥ 112 psid at a flow of ≥ 3500 gpm.(1)

e. At least once per 18 months during shutdown, by:

1. Cycling each power operated (excluding automatic) valve in the flow path not testable during plant operation, through at least one complete cycle of full travel.

2. Verifying that each automatic valve in the flow path actuates to its correct position on a test signal.

3. Initiating flow through each Service Water subsystem and its two associated recirculation spray heat exchangers, and verifying a flow rate of at least 11,000 gpm.

f. At least once per 5 years by performing an air or smoke flow test through each spray header and verifying each spray nozzle is unobstructed.

(1) Until the beginning of the fifth refueling outage (Mode 5) or until an outage of an expected duration of 30 days or greater, whichever occurs first, 2RSS-P21A recirculation spray pump is only required to develop a differential pressure of ≥ 110 psid at a flow of ≥ 3275 gpm.

ATTACHMENT D

Beaver Valley Power Station, Unit No. 2
Proposed Technical Specification Change No. 87

UNIT NO. 2 REQUEST FOR TECHNICAL
SPECIFICATION ENFORCEMENT DISCRETION
DATED AUGUST 15, 1994