

ATTACHMENT A-1

Beaver Valley Power Station, Unit No. 1
Proposed Technical Specification Change No. 216

The following is a list of the affected pages:

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3/4.0 APPLICABILITYSURVEILLANCE REQUIREMENTS

1. At least HOT STANDBY within the next 6 hours,
2. At least HOT SHUTDOWN within the following 6 hours, and
3. At least COLD SHUTDOWN within the subsequent 24 hours.

This specification is not applicable in MODES 5 or 6.

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the surveillance interval.

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours. Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with a Limiting Condition for Operation has been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2 and 3 components shall be applicable as follows:

- a. ~~Inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).~~

Insert A

- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

(Proposed Wording)

Attachment to Surveillance Requirement 4.0.5

Insert "A"

- a.2 Inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(f).

ADMINISTRATIVE CONTROLS6.1 RESPONSIBILITY

6.1.1 The General Manager, Nuclear Operations shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

6.2 ORGANIZATION6.2.1 ONSITE AND OFFSITE ORGANIZATIONS

Onsite and Offsite organizations shall be established for facility operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the FSAR.
- b. The General Manager, Nuclear Operations shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The ^{Senior} Vice President, Nuclear ^{Reactor Division} Group shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

(Proposed wording)

UNIT STAFF (Continued)

- 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 General Manager, Nuclear Operations or predesignated alternate, or higher levels of management. Authorized deviations to the working hour guidelines shall be documented and available for NRC review.

(Proposed Wording)

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 Health Physics 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.

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

6.5 REVIEW AND AUDIT

6.5.1 ONSITE SAFETY COMMITTEE (OSC)

FUNCTION

6.5.1.1 The OSC shall function to advise the General Manager Nuclear Operations on all matters related to nuclear safety and shall provide review capability in the areas of:

- a. nuclear power plant operations
- b. radiological safety
- c. maintenance
- d. nuclear engineering
- e. nuclear power plant testing
- f. technical advisory engineering
- g. chemistry
- h. quality control
- i. instrumentation and control

COMPOSITION

6.5.1.2 The Onsite Safety Committee Supervisor is the OSC Chairman and shall appoint all members of the OSC. The membership shall consist of a minimum of one individual from each of the areas designated in 6.5.1.1.

OSC members and alternates shall meet or exceed the minimum qualifications of ANSI N18.1-1971 Section 4.4 for comparable positions. The nuclear power plant operations individual shall meet the qualifications of Section 4.2.2 and the maintenance individual shall meet the qualifications of Section 4.2.3.

(Proposed wording)

AUTHORITY

6.5.1.7 The OSC shall:

- a. Recommend to the General Manager Nuclear Operations written approval or disapproval of items considered under 6.5.1.6.a through .d above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6.a through .e above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the ^{Power Division} Vice President Nuclear ~~Group~~ and the Offsite Review Committee of disagreement between the OSC and the General Manager Nuclear Operations; however, the General Manager Nuclear Operations shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above. ^{Senior}

RECORDS

6.5.1.8 The OSC shall maintain written minutes of each meeting and copies shall be provided to the General Manager Nuclear Operations and Chairman of the Offsite Review Committee.

6.5.2 OFFSITE REVIEW COMMITTEE (ORC)

FUNCTION

6.5.2.1 The ORC shall function to provide independent review and audit of designated activities in the areas of:

- a. nuclear power plant operations
- b. nuclear engineering
- c. chemistry and radiochemistry
- d. metallurgy
- e. instrumentation and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. quality assurance practices

COMPOSITION

6.5.2.2 / ^{Senior} The chairman and all members of the ORC shall be appointed by the Vice President, Nuclear Group. ^{Power Division} The membership shall consist of a minimum of five individuals who collectively possess a broad based level of experience and competence enabling the committee to review and audit those activities designated in 6.5.2.1 above and to recognize when it is necessary to obtain technical advice and counsel. An individual may possess expertise in more than one specialty area. The collective competence of the committee will be maintained as changes to the membership are made.

ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the ORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in ORC activities at any one time.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the ORC Chairman to provide expert advice to the ORC.

(Proposed wording)

ADMINISTRATIVE CONTROLS

AUDITS

6.5.2.8 Audits of facility activities shall be performed under the cognizance of the ORC. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions ~~at least once per 12 months.~~
- b. The performance, training and qualifications of the entire facility staff ~~at least once per 12 months.~~
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or methods of operation that affect nuclear safety ~~at least once per 6 months.~~
- d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, ~~at least once per 24 months.~~

e. The Facility Emergency Plan and implementing procedures at least once per 12 months. *Replace with "Not Used"*

f. The Facility Security Plan and implementing procedures at least once per 12 months. *Replace with "Not Used"*

g. Any other area of facility operation considered appropriate by the ORC or the Vice President, Nuclear, *Senior Power Division*

h. The Facility Fire Protection Program and implementing procedures ~~at least once per 24 months.~~

i. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified off-site licensee personnel or an outside fire protection firm. *Replace with "Not Used"*

j. An inspection and audit of the fire protection and loss prevention program shall be performed by a qualified outside fire consultant ~~at least once per 36 months.~~

k. The Offsite Dose Calculation manual and implementing procedures.

l. The Process Control Program and implementing procedures for processing and packaging of radioactive waste.

(Proposed wording)

ADMINISTRATIVE CONTROLS

AUTHORITY

6.5.2.9 The *Power Division* ORC shall report to and advise the *Senior* Vice President, Nuclear ~~Group~~ on those areas of responsibility specified in Section 6.5.2.7 and 6.5.2.8.

RECORDS

6.5.2.10 Records of ORC activities shall be prepared, approved and distributed as indicated by the following:

- a. Minutes of each ORC meeting shall be prepared for and approved by the ORC Chairman or Vice-Chairman within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be documented in the ORC meeting minutes.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the *Senior* Vice President, Nuclear ~~Group~~ *Power Division* and to the management positions responsible for the areas audited within 30 days after completion of the audit.

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 10CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the OSC, and results of this review shall be submitted to the ORC.

6.7 SAFETY LIMIT VIOLATION

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

- a. The facility shall be placed in at least HOT STANDBY within one (1) hour.
- b. The Safety Limit violation shall be reported to the Commission within one hour and to the General Manager, Nuclear Operations and to the ORC within 24 hours.

(Proposed wording)

ADMINISTRATIVE CONTROLS

SAFETY LIMIT VIOLATION (Continued)

- 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.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the ORC and the General Manager, Nuclear Operations 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. Security Plan implementation. *Replace with "Not Used"*
- e. Emergency Plan implementation. *Replace with "Not Used"*
- f. Fire Protection Program implementation.
- g. PROCESS CONTROL PROGRAM implementation.
- h. OFFSITE DOSE CALCULATION MANUAL implementation.

6.8.2 Each procedure and administrative policy of 6.8.1 above and changes of intent thereto, shall be reviewed by the OSC and approved by the General Manager Nuclear Operations, predesignated alternate or a predesignated Manager to whom the General Manager Nuclear Operations has assigned in writing the responsibility for review and approval of specific subjects considered by the committee, as applicable. Changes to procedures and administrative policies of 6.8.1 above that do not receive OSC review, such as correcting typographical errors, reformatting procedures and other changes not affecting the purpose for which the procedure is performed shall receive an independent review by a qualified individual and approved by a designated manager or director.

(Proposed wording)

ATTACHMENT A-2

Beaver Valley Power Station, Unit No. 2
Proposed Technical Specification Change No. 83

The following is a list of the affected pages:

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- 4 - Replace with "Deleted"

- (3) Initial Startup Test Program (Section 14 of the SER, and Supplements 3 and 5)

Any changes to the Initial Test Program described in Section 14 of the FSAR made in accordance with the provisions of 10 CFR 50.59 shall be reported in accordance with 50.59(b) within one month of such change.

- (4) Fresh Fuel Storage

The following criteria apply to the storage and handling of new fuel assemblies in the fuel handling building:

- (a) No more than two fuel assemblies shall be out of approved shipping containers or fuel assembly storage racks at any one time.
- (b) The minimum edge-to-edge distance between the above two new assemblies, the shipping container array, and the storage rack arrays shall be at least 12 inches.
- (c) New fuel assemblies shall be stored in such a manner that water would drain freely from the assemblies in the event of flooding and subsequent draining of the fuel storage area.

- (5) Inservice Inspection (Section 6.6 of SER Supplement 5)

DLCO shall submit an inservice inspection program in accordance with 10 CFR 50.55a(g)(4) for staff review by June 1, 1988.

- (6) Formal Federal Emergency Management Agency Finding

In the event that the NRC finds that the lack of progress in completion of the procedures in the Federal Emergency Management Agency's final rule, 44 CFR Part 350, is an indication that a major substantive problem exists in achieving or maintaining an adequate state of emergency preparedness, the provisions of 10 CFR Section 50.54(s)(2) will apply.

- (7) Plant Safety Monitoring System (PSMS)

DLCO shall submit, on or before November 27, 1987, a verification and validation (V&V) plan which will be able to demonstrate the reliability of the PSMS software. The approved V&V plan must be implemented before startup after the second refueling outage.

Replace with "Deleted"

Amendment No.

(Proposed wording)

Replace with "Deleted"

(8) Detailed Control Room Design Review (DCRDR)

Before startup after the first refueling outage, DLCo shall complete all activities, satisfactorily resolve all open issues as described in Section 18.1 of SER Supplement 6, and implement all DLCo-proposed control room improvements resulting from this review. For items specified in the safety evaluation issued with Amendment No. 16, implement before startup from the second refueling outage.

(9) Safety Parameter Display System (SPDS)

Before startup after the first refueling outage, DLCo shall perform the necessary activities, provide acceptable responses, and implement all proposed corrective actions related to issues as described in Section 18.2 of SER Supplement 6. For items specified in the safety evaluation issued with Amendment No. 16, implement before startup from the second refueling outage.

Replace with "Deleted"

(10) Fire Protection Modifications (Section 9.5.1 of SER Supplement 6)

By September 30, 1987, DLCo shall complete the installation of back draft dampers to mitigate overpressurization caused by carbon dioxide system discharge. Until the time that this work is complete, DLCo shall maintain fire watches in those areas in accordance with the commitments made in letters dated May 20 and 21, 1987.

D. Exemptions

Replace with "Deleted"

The following exemptions are authorized by law and will not endanger life or property or the common defense and security, and certain special circumstances are present. With the granting of these exemptions, the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.

- (1) The facility requires an exemption from the requirements of General Design Criterion (GDC) 4, Appendix A to 10 CFR 50. The staff has described in detail in Supplement 4 and Supplement 5 to the Safety Evaluation Report the technical basis and "special circumstances" associated with this exemption. The staff's environmental assessment was published on March 27, 1987 (52 FR 9979). Therefore, pursuant to 10 CFR 50.12(a)(1), 10 CFR 50.12(a)(2)(ii) and (iv), Beaver Valley Power Station, Unit 2 is exempt from the requirements of GDC 4, Appendix A to 10 CFR 50 with respect to the dynamic loading effects associated with the postulated pipe breaks described in detail in Section 3.6.3 of Supplement 4 to the Safety Evaluation Report. These dynamic loading effects include pipe whip, jet impingement, and break-associated dynamic transients. Specifically, this eliminates the need to install jet impingement barriers and pipe whip restraints associated with postulated pipe breaks in the pressurizer surge line, reactor coolant bypass system,

(Proposed wording)

Amendment No.

APPLICABILITYSURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the surveillance interval.

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours. Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with a Limiting Condition for Operation has been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:

- a.) ~~Inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).~~

Insert B

- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

Attachment to Surveillance Requirement 4.0.5

Insert "B"

- a.2. Inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(f).

6.0 ADMINISTRATIVE CONTROLS6.1 RESPONSIBILITY

6.1.1 The General Manager, Nuclear Operations shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

6.2 ORGANIZATION6.2.1 ONSITE AND OFFSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for facility operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the FSAR.
- b. The General Manager, Nuclear Operations shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. ^{Senior} The Vice President, ^{Power Division} Nuclear Group shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.2.2 UNIT STAFF

The unit organization shall be subject to the following:

- a. Each duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor.
- 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.

(Proposed Wording)

ADMINISTRATIVE CONTROLSUNIT STAFF (Continued)

- d. An individual qualified in radiation protection procedures shall be onsite when fuel is in the reactor.
- 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.
- 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.
- 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 General Manager, Nuclear Operations or predesignated alternate, or higher levels of management. Authorized deviations to the working hour guidelines shall be documented and available for NRC review.

6.2.3 INDEPENDENT SAFETY EVALUATION GROUP (ISEG)FUNCTION

6.2.3.1 The ISEG shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving unit safety to corporate management. If not otherwise implemented, all recommendations shall then be made to the Vice President, Nuclear Group.

Senior
Power Division
(Proposed Wording)

ADMINISTRATIVE CONTROLS

COMPOSITION

6.2.3.2 The ISEG shall be composed of at least five, dedicated, full-time engineers located on site. Each shall have either:

- (1) A bachelor's degree in engineering or related science and at least 2 years professional level experience in his field, at least 1 year of which experience shall be in the nuclear field, or
- (2) At least 5 years of nuclear experience and hold or have held a Senior Reactor Operator license, or
- (3) At least 10 years of professional level experience in his field, at least 5 years of which experience shall be in the nuclear field.

A minimum of 50% of these personnel shall have the qualifications specified in (1) above.

RESPONSIBILITIES

6.2.3.3 The ISEG shall be responsible for maintaining surveillance of unit activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

RECORDS

6.2.3.4 Records of activities performed by the ISEG shall be prepared, maintained, and a summary report shall be forwarded each calendar month to the Vice President, Nuclear ~~Group~~.

Power Division

Senior

*Not responsible for sign-off function.

(Proposed wording)

ADMINISTRATIVE CONTROLS6.3 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 Health Physics 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.

6.4 TRAINING

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

6.5 REVIEW AND AUDIT6.5.1 ONSITE SAFETY COMMITTEE (OSC)FUNCTION

6.5.1.1 The OSC shall function to advise the General Manager Nuclear Operations on all matters related to nuclear safety and shall provide review capability in the areas of:

- a. nuclear power plant operations
- b. radiological safety
- c. maintenance
- d. nuclear engineering
- e. nuclear power plant testing
- f. technical advisory engineering
- g. chemistry
- h. quality control
- i. instrumentation and control

COMPOSITION

6.5.1.2 The Onsite Safety Committee Supervisor is the OSC Chairman and shall appoint all members of the OSC. The membership shall consist of a minimum of one individual from each of the areas designated in 6.5.1.1.

OSC members and alternates shall meet or exceed the minimum qualifications of ANSI N18.1-1971 Section 4.4 for comparable positions. The nuclear power plant operations individual shall meet the qualifications of Section 4.2.2 and the maintenance individual shall meet the qualifications of Section 4.2.3.

(Proposed wording)

ADMINISTRATIVE CONTROLSAUTHORITY

6.5.1.7 The OSC Shall:

- a. Recommend to the General Manager, Nuclear Operations written approval or disapproval of items considered under 6.5.1.6. a through d above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6. a through e above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the ^{Senior} Vice President, Nuclear Group and the Offsite Review Committee of disagreement between the OSC and the General Manager, ~~for~~ Nuclear Operations; however, the General Manager, ~~for~~ Nuclear Operations shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

Power
Division

RECORDS

6.5.1.8 The OSC shall maintain written minutes of each meeting and copies shall be provided to the General Manager, Nuclear Operations and Chairman of the Offsite Review Committee.

6.5.2 OFFSITE REVIEW COMMITTEE (ORC)FUNCTION

6.5.2.1 The ORC shall function to provide independent review and audit of designated activities in the areas of:

- a. nuclear power plant operations
- b. nuclear engineering
- c. chemistry and radiochemistry
- d. metallurgy
- e. instrumentation and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. quality assurance practices

(Proposed wording)

ADMINISTRATIVE CONTROLS

COMPOSITION

Power Division

Senior 6.5.2.2 The chairman and ~~all~~ members of the ORC shall be appointed by the Vice President, Nuclear Group. The membership shall consist of a minimum of five individuals who collectively possess a broad based level of experience and competence enabling the committee to review and audit those activities designated in 6.5.2.1 above and to recognize when it is necessary to obtain technical advice and counsel. An individual may possess expertise in more than one speciality area. The collective competence of the committee will be maintained as changes to the membership are made.

ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the ORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in ORC activities at any one time.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the ORC Chairman to provide expert advice to the ORC.

MEETING FREQUENCY

6.5.2.5 The ORC shall meet at least once per calendar quarter during the initial year of facility operation following fuel loading and at least once per six months thereafter.

QUORUM

6.5.2.6 A quorum of ORC shall consist of the Chairman or his designated alternate and at least four members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the facility.

REVIEW

6.5.2.7 The ORC shall review:

- a. The safety evaluations for 1) changes to procedures, equipment, or systems and 2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.

ADMINISTRATIVE CONTROLSREVIEW (Continued)

- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes in Technical Specifications or licenses.
- e. Violations of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All REPORTABLE EVENTS.
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety-related structures, systems, or components.
- i. Reports and meeting minutes of the OSC.
- j. The results of the Radiological^{Environmental} Monitoring Program prior to submittal of the annual report provided in accordance with Specification 6.9.1.10.

AUDITS

6.5.2.8 Audits of facility activities shall be performed under the cognizance of the ORC. These audits shall encompass:

- a. The conformance of facility operations to provisions contained within the Technical Specifications and applicable license conditions ~~at least once per 12 months.~~
- b. The performance, training, and qualifications of the entire facility staff ~~at least once per 12 months.~~
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or methods of operation that affect nuclear safety ~~at least once per 6 months.~~
- d. The performance^S activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50_X ~~at least once per 24 months.~~
- e. The Facility Emergency Plan and implementing procedures at least once per 12 months.

Replace with "Not used."

ADMINISTRATIVE CONTROLSAUDITS (Continued)*Replace with "Not Used"*

- f. The Facility Security Plan and implementing procedures at least once per 12 months.
- g. Any other area of facility operation considered appropriate by the ORC or the Vice President, Nuclear.
- h. *Senior* The Facility Fire Protection Program and implementing procedures *Power Division* ~~at least once per 24 months.~~
- i. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified off-site licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by a qualified outside fire consultant ~~at least once per 36 months.~~

*Replace with "Not Used"*AUTHORITY

- k. *The Offsite Dose Calculation manual and implementing procedures.*
 - l. *The Process Control Program and implementing procedures for processing and packaging of radioactive waste.*
- 6.5.2.9 The ORC shall report to and advise the Vice President, Nuclear Group on those areas of responsibility specified in Section 6.5.2.7 and 6.5.2.8. *Senior* *Power Division*

RECORDS

6.5.2.10 Records of ORC activities shall be prepared, approved, and distributed as indicated by the following:

- a. Minutes of each ORC meeting shall be prepared for and approved by the ORC Chairman or Vice Chairman within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be documented in the ORC meeting minutes.
- c. *Senior* Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Vice President, Nuclear Group and to the management positions responsible for the areas audited within 30 days after completion of the audit. *Power Division*

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

ADMINISTRATIVE CONTROLS6.7 SAFETY LIMIT VIOLATION

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

- a. The facility shall be placed in at least HOT STANDBY within one (1) hour.
- b. The Safety Limit violation shall be reported to the Commission within one hour. The Safety Limit violation shall be reported to the General Manager, Nuclear Operations and to the ORC within 24 hours.
- 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.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the ORC and the General Manager, Nuclear Operations 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. Security Plan implementation. *Replace with "Not Used"*
- e. Emergency Plan implementation. *Replace with "Not Used"*
- f. Fire Protection Program implementation.
- g. PROCESS CONTROL PROGRAM implementation.
- h. OFFSITE DOSE CALCULATION MANUAL implementation.

6.8.2 Each procedure and administrative policy of 6.8.1 above and changes of intent thereto, shall be reviewed by the OSC and approved by the General Manager Nuclear Operations, predesignated alternate or a predesignated Manager to whom the General Manager Nuclear Operations has assigned in writing the responsibility for review and approval of specific subjects considered by the committee, as applicable. Changes to procedures and administrative policies of 6.8.1 above that do not receive OSC review, such as correcting typographical errors, reformatting procedures and other changes not affecting the purpose for which the procedure is performed shall receive an independent review by a qualified individual and approved by a designated manager or director.

ATTACHMENT B

Beaver Valley Power Station, Unit Nos. 1 and 2 Proposed Technical Specification Change Nos. 216 and 83 REVISION OF ADMINISTRATIVE CONTROLS

A. DESCRIPTION OF AMENDMENT REQUEST

The proposed amendment consists of the following:

- 1) Elimination of the references to specific frequencies for each of the Technical Specification required audits.
- 2) Elimination of the references to reviews and audits of the Emergency Plan and Security Plan.
- 3) Separation of the Inservice Inspection and Inservice Testing Programs surveillance requirements and removal of the requirement that relief requests be granted before they are implemented for both IST and ISI.
- 4) Editorial changes which were necessitated by a reorganization.
- 5) Elimination of the reference to Appendix A of 10 CFR Part 55.
- 6) Elimination of the requirement to perform an independent fire protection and loss prevention program inspection annually.
- 7) Inclusion of the Offsite Dose Calculation Manual and Process Control Program and associated implementing procedures into the list of required audits.
- 8) Updates of the Beaver Valley Power Station (BVPS) Unit 2 License Conditions.

B. BACKGROUND

Currently, the Administrative Controls section of the Standard Technical Specifications for Westinghouse Plants (NUREG-1431, Vol. 1) states that the combination of reviews and audits should be integrated "into a cohesive program that provides senior management with an assessment of facility operation and recommends actions to improve nuclear safety and plant reliability." Therefore, these administrative tools should be sufficiently flexible to allow for senior management direction of resources to focus upon areas requiring increased attention. The proposed changes to the Technical Specification administrative controls Section 6.5.2.8 would provide such flexibility through the elimination of certain rigid audit frequencies.

Additionally, references in Section 6.5.2.8 to reviews and audits of the facility's Emergency Plan and Physical Security Plan (and

of their associated implementing procedures) would be removed from the Technical Specifications because those requirements presently exist within the individual plans. This action reflects the guidance provided in Nuclear Regulatory Commission (NRC) Generic Letter 93-07, "Modification of the Technical Specification Administrative Control Requirements for Emergency and Security Plans," which was issued on December 28, 1993.

Also, the substance of the audits presently performed to assess the fire protection program at BVPS will be combined into one audit which will be performed biennially. The one proposed audit that will be performed will encompass the technical specification requirements of the two audits that are presently performed per Section 6.5.2.8(h) and (i).

Editorial changes have been made to Section 6 of the technical specifications because of internal organizational changes made at BVPS. Changes were made to Technical Specification 4.0.5 and Administrative Controls Section 6.4.1 to reflect revisions in the Code of Federal Regulations.

Six license conditions contained in Section 2.C of Facility Operating License No. NPF-73 for Unit 2 have been completed. As such, it is no longer necessary to continue to retain these items in the Unit 2 license.

C. JUSTIFICATION

The scope and schedule for audits performed under the direction of the Offsite Review Committee (ORC) are currently specified by Administrative Controls Section 6.5.2.8 of the BVPS Technical Specifications. The specific audits and their associated frequencies have been developed and implemented to comply with requirements from various sources including the Code of Federal Regulations (Facility Security Plan, Facility Emergency Plan, etc.), Standard Technical Specifications, NRC Generic Communication (annual, biennial, and triennial Fire Protection audits), industry guidelines and standards (Conformance to Technical Specifications and Operating License, Effectiveness of Corrective Actions, and Training audits). The audits specified by these sources are meant to address programs which are deemed to be essential to the effective management of a nuclear facility. However, the rigid schedules dictated by the Technical Specifications Administrative Controls Section 6.5.2.8 do not allow management the flexibility to recognize exceptional performance by certain organizations. Resources which could be devoted to areas with perceived weaknesses are diluted by the requirement to audit strong programs at the frequencies set forth in the Technical Specifications. The proposed changes would provide for decreasing the frequencies of certain audits, increasing the frequency of the triennial fire protection audit

to biennial, and maintaining the frequency of those audits presently scheduled biennially. Additional flexibility would also be introduced by allowing a 25 percent extension to the frequency of most audits (presently defined in the Duquesne Light Company commitment to NRC Regulatory Guide 1.144 "Auditing of Quality Assurance Programs for Nuclear Power Plants," and Regulatory Guide 1.33, "Quality Assurance Program Requirements [Operation]"). The exceptions to this frequency extension or "grace period" would be those audits which have frequencies specifically delineated by the Code of Federal Regulations (i.e., Emergency Plan and Implementing Procedures Audit and Facility Security Plan and Implementing Procedures Audit).

The proposed amendment would eliminate the references to specific frequencies for each of the technical specification required audits. Instead, a statement will be added to the Updated Final Safety Analysis Report (Section 1.3.4.1 Unit 1 and Table 1.8-1 - Unit 2, see Attachment D) specifying that the audits listed in the Technical Specifications Administrative Controls Section 6.5.2.8 will be accomplished on a biennial (2 years) frequency as defined by Quality Services Unit Program commitments to NRC Regulatory Guide 1.144 and NRC Regulatory Guide 1.23 and as directed by administrative procedures and/or management. This change will allow management the flexibility to allocate Quality Services Unit resources in the most efficient manner. This will enhance the safety of the Beaver Valley Power Station by placing an emphasis on those functional areas that have perceived weaknesses.

Another program change which will enhance the Quality Assurance program at the Beaver Valley Power Station is the introduction of a 25 percent grace period for audit frequencies. The additional flexibility of a grace period would give auditors the opportunity to perform audits when certain activities are actually occurring. The 25 percent grace period coupled with the relaxation of the strict schedules dictated by the technical specifications will provide the auditors the ability to actually observe the processes being audited rather than simply reviewing the procedures that are followed to perform the activities. This will also allow the auditors to assess procedure compliance.

Additionally, the fire protection audit frequency will be increased from triennially to biennially. Duquesne Light Company (DLC) is combining the two fire protection audits which are currently listed in the Technical Specification Administrative Controls Section 6.5.2.8 into one audit because many requirements of the two audits are similar. The combination of the two audits will allow greater scheduling flexibility with one audit addressing the requirements presently addressed in two. The new inspection will reduce redundancies in evaluating the fire protection and loss prevention programs.

The NRC issued Generic Letter 93-07 to provide guidance for relocating certain requirements from the technical specifications to other NRC-approved program documents. Generic Letter 93-07 specifically addresses the reviews and audits of the Emergency Plan and implementing procedures and the Security Plan and implementing procedures. Currently, the requirements for these reviews and audits are incorporated into the BVPS Emergency and Security Plans. The proposed changes would delete the redundant references in the facility's Technical Specifications Administrative Controls Sections 6.5.2.8, 6.8.1, and 6.8.2 since the requirements already exist in Title 10 of the Code of Federal Regulations [10 CFR 50.54(t) for Emergency Preparedness and 10 CFR 50.54(p), 10 CFR 73.40, 10 CFR 73.55, and 10 CFR 73.56 for Security]. Generic Letter 93-07 does not require licensees to incorporate the requirements of Section 6.8.3 of the technical specifications into the Emergency and Security Plans. Section 6.8.3 contains the requirements for temporary procedure change review and approval. Also, Title 10 of the Code of Federal Regulations does not address temporary procedure changes. Therefore, BVPS will no longer require that temporary changes to Security and EPP procedures be reviewed and approved by the Onsite Safety Committee as described in Section 6.8.3.

The proposed amendment will revise the Administrative Controls Section of the BVPS Units 1 and 2 Technical Specifications in accordance with the guidance provided in Generic Letter 93-07. This amendment will not reduce the audit frequencies of the Emergency or Security Plans because the audit frequencies for these plans are defined in the Code of Federal Regulations. Therefore, the proposed changes would remove a redundancy only, not alter the audit or audit frequencies of the Emergency or Security Plans.

Due to changes in the Code of Federal Regulations, the references in Technical Specification 4.0.5 associated with the Inservice Inspection (ISI) and Inservice Testing (IST) Programs were revised. This is because the requirements for these two programs are now contained in two separate paragraphs in 10 CFR Part 50. Also, Appendix A to 10 CFR Part 55 was incorporated into the body of 10 CFR Part 55 which necessitates a reference change for Technical Specification 6.4.1. Both of these changes are editorial only and were necessitated by changes to 10 CFR Part 50 and Part 55.

The other change made to Technical Specification 4.0.5 involves the granting of relief requests prior to implementation for both ISI and IST. This requirement was removed in accordance with the guidance provided by draft NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants," dated November, 1993 as well as the requirements of 10 CFR Part 50.55a. Title 10 allows a licensee up to a full year after the beginning of the updated interval to request relief from those new Code requirements which cannot be met.

Several of the license conditions for BVPS Unit 2 are being eliminated because the required actions have been completed. Specifically:

1. License Condition 2.C.(3) - The Initial Test Program no longer exists since Unit 2 started commercial operation in November 1987.
2. License Condition 2.C.(5) - The Inservice Inspection Program was forwarded to the NRC by letter dated June 1, 1988.
3. License Condition 2.C.(7) - The verification and validation plan which is used to demonstrate the reliability of the Plant Safety Monitoring System was implemented prior to startup from the second refueling outage. The NRC was apprised of this in a letter dated December 4, 1990.
4. License Condition 2.C.(8) - All detailed Control Room Design Review corrective and other actions were implemented prior to the startup following the second refueling outage. The letter forwarding all pertinent information to the NRC was dated December 3, 1990.
5. License Condition 2.C.(9) - The Safety Parameter Display System items identified in the Technical Specification Amendment No. 16 Safety Evaluation were implemented prior to start-up from the second refueling outage. A letter dated December 4, 1990, forwarded the information to the NRC.
6. License Condition 2.C.(10) - A letter dated September 30, 1987, informed the NRC that the installation of back draft dampers had eliminated the overpressure problems associated with the CO₂ discharge.

D. SAFETY ANALYSIS

The removal of the audit of the emergency and security plans and implementing procedures from the list of responsibilities of the BVPS ORC contained in Administrative Controls Section 6.5.2.8 is consistent with the guidance provided in Generic Letter 93-07. Specifically, Parts 50 and 73 of Title 10 of the Code of Federal Regulations include provisions that are sufficient to address these requirements. The emergency and security plans also include the requirement that the Quality Services Unit audit the plans annually. Therefore, this change eliminates redundant references only and no reduction in audit frequency will occur for the emergency and security plans. This proposed change neither alters the functions nor diminishes the quality of the audit program.

Also, in keeping with the guidance provided in the generic letter the proposed change will remove the requirements in

Administrative Controls Section 6.8.1 for the safety review committee to review procedures, and procedure changes, for the implementation of the emergency and security plans. The requirements for safety committee reviews of procedures, and procedure changes, for the implementation of the emergency and security plans currently exists in the respective plans. Therefore, removal of this requirement from the Technical Specifications eliminates a redundancy only. No reduction in safety will ensue because of this elimination.

A further proposed change to the Technical Specifications Administrative Controls Section 6.5.2.8 involves the removal of the specific audit frequencies for those audits listed. Commensurate with the removal of the audit frequencies from the Technical Specifications will be the addition of a statement in the Updated Final Safety Analysis Report (Section 1.3.4.1 - Unit 1 and Table 1.8-1 - Unit 2; see Attachment D) specifying that the audits listed in the Technical Specifications will be accomplished on a biennial (2 years) frequency. The purpose, scope, and thoroughness of Quality Assurance audits will not be affected, management oversight of the audit process will not be diminished, and the audits will be performed at frequencies commensurate with safety significance and not less than biennially. This will include the 25 percent grace period on the audit frequencies. The use of an audit frequency grace period does not decrease the effectiveness of audits nor does it adversely affect safety. The grace period allows scheduling flexibility that gives the auditors the opportunity to audit activities when they are performed. As such, the above described changes are consistent with the intent of the regulations and are an acceptable alternative.

The other proposed change to the audits listed in Technical Specifications Administrative Controls Section 6.5.2.8 involves combining the aspects of the annual and triennial fire protection and loss prevention inspection and audit into one biennial audit. A qualified outside consultant will be utilized every 2 years rather than every 3 years as is the current practice. The proposed changes will not adversely impact the effectiveness of either the Fire Protection/Loss Prevention Program or the Audit Program for the following reasons: 1) the proposed alternate audit program continues to evaluate the areas addressed in NRC Generic Letter 82-21, "Technical Specifications for Fire Protection Audits"; 2) utilizes the same recommended resources; and 3) is comprehensive in its review of fire protection and loss prevention features.

The Offsite Dose Calculation Manual and Process Control Program and associated implementing procedures are being added to the list of required audits in Technical Specification Administrative Controls Section 6.5.2.8. Although they have always been audited as parts of other program audits, the inclusion of these programs

into the Technical Specification will provide for a formal audit review of these areas which will enhance the review process.

The other changes to the Technical Specifications are purely editorial. Some of the changes to the Administrative Controls Section 6 were necessitated by an internal reorganization, others reflect changes to 10 CFR which include:

1. The NRC revised 10 CFR Part 50 to separate the Inservice Testing (IST) requirements from the Inservice Inspection (ISI) requirements by placing the IST requirements into a new paragraph, 10 CFR Part 50.55a(f). This necessitated a change in references in Technical Specification 4.0.5.
2. Appendix A to 10 CFR Part 55 was incorporated into the body of 10 CFR Part 55. Therefore, Technical Specification 6.4.1 was revised to remove the reference to Appendix A.

Technical Specification 4.0.5 was also revised to remove "except where specific written relief has been granted" for both the ISI and IST programs. This is in accordance with the guidance provided by draft NUREG-1482. This revision reflects the NRC's position that licensees must establish and implement their IST program in accordance with 10 CFR Part 50.55a, which does not require that relief requests be granted before they are implemented. Rather, the regulations allow a licensee up to a full year after the beginning of the updated interval to inform the NRC of those new Code requirements which cannot be met and to request relief.

Lastly, as described above, several Unit 2 license conditions have been eliminated because they are no longer applicable.

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 likelihood that an accident will occur is neither increased or decreased by this proposed Technical Specification change which only affects review and audit frequencies, removes redundancies in the audit program, corrects editorial information, and updates the Unit 2 license conditions. This Technical Specification change will not impact the function or method of operation of plant equipment. Thus, there is not a significant increase in the probability of a previously analyzed accident due to this change. No systems, equipment, or components are affected by the proposed change. Thus, the consequences of a malfunction of equipment important to safety previously evaluated in the Updated Final Safety Analysis Report are not increased by this change.

The proposed change affects audit frequencies, types of audits listed in the technical specifications, references for some technical specification sections, the time frame for Inservice Testing (IST) and Inservice Inspection (ISI) relief request submittals, and editorial changes necessitated by an internal reorganization. As such, the proposed change has no impact on accident initiators or plant equipment, and therefore, does not affect the probabilities or consequences of an accident.

Therefore, the proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed technical specification revisions do not involve changes to the physical plant or operations. Since program audits, organizational titles, and technical specification references do not contribute to accident initiation, a change related to the areas listed in the description section of this Attachment cannot produce a new accident scenario or produce a new type of equipment malfunction. Therefore, this change does not alter any existing accident scenarios. The proposed change does not affect equipment or its operation.

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?

The proposed change concerns the conduct of audits, technical specification references, ISI and IST relief request submittals, completed License conditions, and organizational title changes and does not directly affect plant equipment or operation. Safety limits and limiting safety system settings are not affected by this proposed change.

Therefore, use of the proposed Technical Specification would not involve a significant reduction in the 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.

G. UFSAR CHANGES

Suggested UFSAR changes are provided in Attachments D-1 and D-2.

ATTACHMENT C-1

Beaver Valley Power Station, Unit No. 1
Proposed Technical Specification Change No. 216

Applicable Typed Pages

ATTACHMENT TO LICENSE AMENDMENT NO. _____

FACILITY OPERATING LICENSE NO. DPR-66

DOCKET NO. 50-334

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

<u>Remove</u>	<u>Insert</u>
3/4 0-2	3/4 0-2
-	3/4 0-3
6-1	6-1
6-3	6-3
6-5	6-5
6-7	6-7
6-8	6-8
6-10	6-10
6-11	6-11
6-12	6-12

(Proposed Wording)

SURVEILLANCE REQUIREMENTS

1. At least HOT STANDBY within the next 6 hours,
2. At least HOT SHUTDOWN within the following 6 hours, and
3. At least COLD SHUTDOWN within the subsequent 24 hours.

This specification is not applicable in MODES 5 or 6.

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the surveillance interval.

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours. Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with a Limiting Condition for Operation has been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2 and 3 components shall be applicable as follows:

- a.1 Inservice inspection of ASME Code Class 1, 2 and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g).

SURVEILLANCE REQUIREMENTS

- a.2 Inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(f).
- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

ASME Boiler and Pressure Vessel
Code and applicable Addenda
terminology for inservice
inspection and testing activities

Required frequencies for
performing inservice
inspection and testing
activities

Weekly
Monthly
Quarterly or every 3 months
Semiannually or every 6 months
Every 9 months
Yearly or annually

At least once per 7 days
At least once per 31 days
At least once per 92 days
At least once per 184 days
At least once per 276 days
At least once per 366 days

- c. The provisions of Specification 4.0.2 are applicable to the above required frequencies for performing inservice inspection and testing activities.
- d. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.
- e. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

6.1 RESPONSIBILITY

6.1.1 The General Manager, Nuclear Operations shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

6.2 ORGANIZATION

6.2.1 ONSITE AND OFFSITE ORGANIZATIONS

Onsite and Offsite organizations shall be established for facility operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the FSAR.
- b. The General Manager, Nuclear Operations shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Senior Vice President, Nuclear Power Division shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

UNIT STAFF (Continued)

- 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 General Manager, Nuclear Operations or predesignated alternate, or higher levels of management. Authorized deviations to the working hour guidelines shall be documented and available for NRC review.

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 Health Physics 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.

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Nuclear Training Manager 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 REVIEW AND AUDIT

6.5.1 ONSITE SAFETY COMMITTEE (OSC)

FUNCTION

6.5.1.1 The OSC shall function to advise the General Manager Nuclear Operations on all matters related to nuclear safety and shall provide review capability in the areas of:

- a. nuclear power plant operations
- b. radiological safety
- c. maintenance
- d. nuclear engineering
- e. nuclear power plant testing
- f. technical advisory engineering
- g. chemistry
- h. quality control
- i. instrumentation and control

COMPOSITION

6.5.1.2 The Onsite Safety Committee Supervisor is the OSC Chairman and shall appoint all members of the OSC. The membership shall consist of a minimum of one individual from each of the areas designated in 6.5.1.1.

OSC members and alternates shall meet or exceed the minimum qualifications of ANSI N18.1-1971 Section 4.4 for comparable positions. The nuclear power plant operations individual shall meet the qualifications of Section 4.2.2 and the maintenance individual shall meet the qualifications of Section 4.2.3.

AUTHORITY

6.5.1.7 The OSC shall:

- a. Recommend to the General Manager Nuclear Operations written approval or disapproval of items considered under 6.5.1.6.a through .d above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6.a through .e above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the Senior Vice President, Nuclear Power Division and the Offsite Review Committee of disagreement between the OSC and the General Manager Nuclear Operations; however, the General Manager Nuclear Operations shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The OSC shall maintain written minutes of each meeting and copies shall be provided to the General Manager Nuclear Operations and Chairman of the Offsite Review Committee.

6.5.2 OFFSITE REVIEW COMMITTEE (ORC)

FUNCTION

6.5.2.1 The ORC shall function to provide independent review and audit of designated activities in the areas of:

- a. nuclear power plant operations
- b. nuclear engineering
- c. chemistry and radiochemistry
- d. metallurgy
- e. instrumentation and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. quality assurance practices

COMPOSITION

6.5.2.2 The chairman and all members of the ORC shall be appointed by the Senior Vice President, Nuclear Power Division. The membership shall consist of a minimum of five individuals who collectively possess a broad based level of experience and competence enabling the committee to review and audit those activities designated in 6.5.2.1 above and to recognize when it is necessary to obtain technical advice and counsel. An individual may possess expertise in more than one specialty area. The collective competence of the committee will be maintained as changes to the membership are made.

ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the ORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in ORC activities at any one time.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the ORC Chairman to provide expert advice to the ORC.

AUDITS

6.5.2.8 Audits of facility activities shall be performed under the cognizance of the ORC. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions.
- b. The performance, training and qualifications of the entire facility staff.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or methods of operation that affect nuclear safety.
- d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50.
- e. Not used.
- f. Not used.
- g. Any other area of facility operation considered appropriate by the ORC or Senior Vice President, Nuclear Power Division.
- h. The Facility Fire Protection Program and implementing procedures.
- i. Not used.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by a qualified outside fire consultant.
- k. The Offsite Dose Calculation Manual and implementing procedures.
- l. The Process Control Program and implementing procedures for processing and packaging of radioactive waste.

AUTHORITY

6.5.2.9 The ORC shall report to and advise the Senior Vice President, Nuclear Power Division on those areas of responsibility specified in Section 6.5.2.7 and 6.5.2.8.

RECORDS

6.5.2.10 Records of ORC activities shall be prepared, approved and distributed as indicated by the following:

- a. Minutes of each ORC meeting shall be prepared for and approved by the ORC Chairman or Vice-Chairman within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be documented in the ORC meeting minutes.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Senior Vice President, Nuclear Power Division and to the management positions responsible for the areas audited within 30 days after completion of the audit.

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 10CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the OSC, and results of this review shall be submitted to the ORC.

6.7 SAFETY LIMIT VIOLATION

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

- a. The facility shall be placed in at least HOT STANDBY within one (1) hour.
- b. The Safety Limit violation shall be reported to the Commission within one hour and to the General Manager, Nuclear Operations and to the ORC within 24 hours.

SAFETY LIMIT VIOLATION (Continued)

- 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.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the ORC and the General Manager, Nuclear Operations 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 Each procedure and administrative policy of 6.8.1 above and changes of intent thereto, shall be reviewed by the OSC and approved by the General Manager Nuclear Operations, predesignated alternate of a predesignated Manager to whom the General Manager Nuclear Operations has assigned in writing the responsibility for review and approval of specific subjects considered by the committee, as applicable. Changes to procedures and administrative policies of 6.8.1 above that do not receive OSC review, such as correcting typographical errors, reformatting procedures and other changes not affecting the purpose for which the procedure is performed shall receive an independent review by a qualified individual and approved by a designated manager or director.

ATTACHMENT C-2

Beaver Valley Power Station, Unit No. 2
Proposed Technical Specification Change No. 83

Applicable Typed Pages

ATTACHMENT TO LICENSE AMENDMENT NO. _____

FACILITY OPERATING LICENSE NO. NPF-73

DOCKET NO. 50-412

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

Remove

License Page 4
License Page 5
3/4 0-2
-
6-1
6-2
6-3
6-6
6-8
6-9
6-10
6-11
6-12

Insert

License Page 4
License Page 5
3/4 0-2
3/4 0-3
6-1
6-2
6-3
6-6
6-8
6-9
6-10
6-11
6-12

(Proposed Wording)

(3) Deleted

(4) Fresh Fuel Storage

The following criteria apply to the storage and handling of new fuel assemblies in the fuel handling building:

- (a) No more than two fuel assemblies shall be out of approved shipping containers or fuel assembly storage racks at any one time.
- (b) The minimum edge-to-edge distance between the above two new assemblies, the shipping container array, and the storage rack arrays shall be at least 12 inches.
- (c) New fuel assemblies shall be stored in such a manner that water would drain freely from the assemblies in the event of flooding and subsequent draining of the fuel storage area.

(5) Deleted

(6) Formal Federal Emergency Management Agency Finding

In the event that the NRC finds that the lack of progress in completion of the procedures in the Federal Emergency Management Agency's final rule, 44 CFR Part 350, is an indication that a major substantive problem exists in achieving or maintaining an adequate state of emergency preparedness, the provisions of 10 CFR Section 50.54(s)(2) will apply.

(7) Deleted

(8) Deleted

(9) Deleted

(10) Deleted

D. Exemptions

The following exemptions are authorized by law and will not endanger life or property or the common defense and security, and certain special circumstances are present. With the granting of these exemptions, the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.

(1) The facility requires an exemption from the requirements of General Design Criterion (GDC) 4, Appendix A to 10 CFR 50. The staff has described in detail in Supplement 4 and Supplement 5 to the Safety Evaluation Report the technical basis and "special circumstances" associated with this exemption. The staff's environmental assessment was published on March 27, 1987 (52 FR 9979). Therefore, pursuant to 10 CFR 50.12(a)(1), 10 CFR 50.12(a)(2)(ii) and (iv), Beaver Valley Power Station, Unit 2 is exempt from the requirements of GDC 4, Appendix A to 10 CFR 50 with respect to the dynamic loading effects associated with the postulated pipe breaks described in detail in Section 3.6.3 of Supplement 4 to the Safety Evaluation Report. These dynamic loading effects include pipe whip, jet impingement, and break-associated dynamic transients. Specifically, this eliminates the need to install jet impingement barriers and pipe whip restraints associated with postulated pipe breaks in the pressurizer surge line, reactor coolant bypass system,

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the surveillance interval.

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours. Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with a Limiting Condition for Operation has been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2 and 3 components shall be applicable as follows:

- a.1 Inservice inspection of ASME Code Class 1, 2 and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g).
- a.2 Inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(f).

SURVEILLANCE REQUIREMENTS

- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

ASME Boiler and Pressure Vessel
Code and applicable Addenda
terminology for inservice
inspection and testing activities

Required frequencies for
performing inservice
inspection and testing
activities

Weekly
Monthly
Quarterly or every 3 months
Semiannually or every 6 months
Every 9 months
Yearly or annually

At least once per 7 days
At least once per 31 days
At least once per 92 days
At least once per 184 days
At least once per 276 days
At least once per 366 days

- c. The provisions of Specification 4.0.2 are applicable to the above required frequencies for performing inservice inspection and testing activities.
- d. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.
- e. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

6.1 RESPONSIBILITY

6.1.1 The General Manager, Nuclear Operations shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

6.2 ORGANIZATION6.2.1 ONSITE AND OFFSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for facility operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the FSAR.
- b. The General Manager, Nuclear Operations shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Senior Vice President, Nuclear Power Division shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.2.2 UNIT STAFF

The unit organization shall be subject to the following:

- a. Each duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor.

UNIT STAFF (Continued)

- 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.
- d. An individual qualified in radiation protection procedures shall be onsite when fuel is in the reactor.
- 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.
- 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 shutdowns 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.
- 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 General Manager, Nuclear Operations or predesignated alternate, or higher levels of management. Authorized deviations to the working hour guidelines shall be documented and available for NRC review.

6.2.3 INDEPENDENT SAFETY EVALUATION GROUP (ISEG)

FUNCTION

6.2.3.1 The ISEG shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving unit safety to corporate management. If not otherwise implemented, all recommendations shall then be made to the Senior Vice President, Nuclear Power Division.

COMPOSITION

6.2.3.2 The ISEG shall be composed of at least five, dedicated, full-time engineers located on site. Each shall have either:

- (1) A bachelor's degree in engineering or related science and at least 2 years professional level experience in his field, at least 1 year of which experience shall be in the nuclear field, or
- (2) At least 5 years of nuclear experience and hold or have held a Senior Reactor Operator license, or
- (3) At least 10 years of professional level experience in his field, at least 5 years of which experience shall be in the nuclear field.

A minimum of 50% of these personnel shall have the qualifications specified in (1) above.

RESPONSIBILITIES

6.2.3.3 The ISEG shall be responsible for maintaining surveillance of unit activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

RECORDS

6.2.3.4 Records of activities performed by the ISEG shall be prepared, maintained, and a summary report shall be forwarded each calendar month to the Senior Vice President, Nuclear Power Division.

*Not responsible for sign-off function.

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 Health Physics 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.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Nuclear Training Manager 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 REVIEW AND AUDIT

6.5.1 ONSITE SAFETY COMMITTEE (OSC)

FUNCTION

6.5.1.1 The OSC shall function to advise the General Manager Nuclear Operations on all matters related to nuclear safety and shall provide review capability in the areas of:

- a. nuclear power plant operations
- b. radiological safety
- c. maintenance
- d. nuclear engineering
- e. nuclear power plant testing
- f. technical advisory engineering
- g. chemistry
- h. quality control
- i. instrumentation and control

COMPOSITION

6.5.1.2 The Onsite Safety Committee Supervisor is the OSC Chairman and shall appoint all members of the OSC. The membership shall consist of a minimum of one individual from each of the areas designated in 6.5.1.1.

OSC members and alternates shall meet or exceed the minimum qualifications of ANSI N18.1-1971 Section 4.4 for comparable positions. The nuclear power plant operations individual shall meet the qualifications of Section 4.2.2 and the maintenance individual shall meet the qualifications of Section 4.2.3.

AUTHORITY

6.5.1.7 The OSC shall:

- a. Recommend to the General Manager, Nuclear Operations written approval or disapproval of items considered under 6.5.1.6.a through d above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6.a through e above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the Senior Vice President, Nuclear Power Division and the Offsite Review Committee of disagreement between the OSC and the General Manager, Nuclear Operations; however, the General Manager, Nuclear Operations shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The OSC shall maintain written minutes of each meeting and copies shall be provided to the General Manager, Nuclear Operations and Chairman of the Offsite Review Committee.

6.5.2 OFFSITE REVIEW COMMITTEE (ORC)

FUNCTION

6.5.2.1 The ORC shall function to provide independent review and audit of designated activities in the areas of:

- a. nuclear power plant operations
- b. nuclear engineering
- c. chemistry and radiochemistry
- d. metallurgy
- e. instrumentation and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. quality assurance practices

COMPOSITION

6.5.2.2 The chairman and all members of the ORC shall be appointed by the Senior Vice President, Nuclear Power Division. The membership shall consist of a minimum of five individuals who collectively possess a broad based level of experience and competence enabling the committee to review and audit those activities designated in 6.5.2.1 above and to recognize when it is necessary to obtain technical advice and counsel. An individual may possess expertise in more than one specialty area. The collective competence of the committee will be maintained as changes to the membership are made.

ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the ORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in ORC activities at any one time.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the ORC Chairman to provide expert advice to the ORC.

MEETING FREQUENCY

6.5.2.5 The ORC shall meet at least once per calendar quarter during the initial year of facility operation following fuel loading and at least once per six months thereafter.

QUORUM

6.5.2.6 A quorum of ORC shall consist of the Chairman or his designated alternate and at least four members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the facility.

REVIEW

6.5.2.7 The ORC shall review:

- a. The safety evaluations for 1) changes to procedures, equipment, or systems and 2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.

REVIEW (Continued)

- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes in Technical Specifications or licenses.
- e. Violations of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All REPORTABLE EVENTS.
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety-related structures, systems, or components.
- i. Reports and meeting minutes of the OSC.
- j. The results of the Radiological Environmental Monitoring Program prior to submittal of the annual report provided in accordance with Specification 6.9.1.10.

AUDITS

6.5.2.8 Audits of facility activities shall be performed under the cognizance of the ORC. These audits shall encompass:

- a. The conformance of facility operations to provisions contained within the Technical Specifications and applicable license conditions.
- b. The performance, training, and qualifications of the entire facility staff.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or methods of operation that affect nuclear safety.
- d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50.

AUDITS (Continued)

- e. Not used.
- f. Not used.
- g. Any other area of facility operation considered appropriate by the ORC or Senior Vice President, Nuclear Power Division.
- h. The Facility Fire Protection Program and implementing procedures.
- i. Not used.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by a qualified outside fire consultant.
- k. The Offsite Dose Calculation Manual and implementing procedures.
- l. The Process Control Program and implementing procedures for processing and packaging of radioactive waste.

AUTHORITY

6.5.2.9 The ORC shall report to and advise the Senior Vice President, Nuclear Power Division on those areas of responsibility specified in Section 6.5.2.7 and 6.5.2.8.

RECORDS

6.5.2.10 Records of ORC activities shall be prepared, approved and distributed as indicated by the following:

- a. Minutes of each ORC meeting shall be prepared for and approved by the ORC Chairman or Vice Chairman within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be documented in the ORC meeting minutes.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Senior Vice President, Nuclear Power Division and to the management positions responsible for the areas audited within 30 days after completion of the audit.

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

6.7 SAFETY LIMIT VIOLATION

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

- a. The facility shall be placed in at least HOT STANDBY within one (1) hour.
- b. The Safety Limit violation shall be reported to the Commission within one hour and to the General Manager, Nuclear Operations and to the ORC within 24 hours.
- 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.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the ORC and the General Manager, Nuclear Operations 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.

ATTACHMENT D-1

Beaver Valley Power Station, Unit No. 1
Proposed Technical Specification Change No. 216

Applicable UFSAR Changes

Affected Page:

1.3-50

REGULATORY GUIDE 1.70.11: INFORMATION FOR SAFETY ANALYSIS REPORTS
QUALITY ASSURANCE SAFETY OPERATIONS PHASE

The Duquesne Light Company Operations Quality Assurance Program requirements follow the guidance of Regulatory Guide 1.70.11.

REGULATORY GUIDE 1.88, AUGUST, 1974: COLLECTION, STORAGE, AND
MAINTENANCE OF NUCLEAR POWER PLANT QUALITY ASSURANCE RECORDS

The Duquesne Light Company Operations Quality Assurance Program follows the guidance of Regulatory Guide 1.88 with the exception that single Quality Assurance record storage facilities will be designed and constructed in accordance with the guidance of ANSI/ASME NQA-1-1983, Supplement 17S-1, Section 4.4.

REGULATORY GUIDE 1.144, SEPTEMBER 1980: AUDITING OF QUALITY
ASSURANCE PROGRAMS FOR NUCLEAR POWER PLANTS

Beaver Valley Power Station - Unit 1 (BVPS-1) will meet the intent of Regulatory Guide 1.144 for the auditing of its Quality Assurance Program during the operations phase with the following clarifications and alternatives:

Paragraph C.1

The applicability of the referenced regulatory guides/ANSI standards [RG 1.28: ANSI N45.2, RG 1.28: ANSI N45.2.9, and RG 1.74: ANSI N45.2.10] is as stated in the respective positions on these regulatory guides/ANSI standards as described in the UFSAR.

Paragraph C.3

Scheduled internal audit frequency will be as specified in Paragraph C.4 of Regulatory Guide 1.33, Rev. 2, February 1978.

Replace with Insert C

The pre-audit and post-audit conferences required by Sections 4.3.1 and 4.3.3 of ANSI N45.2.12-1977 may be fulfilled by a variety of communications such as telephone conversations.

REGULATORY GUIDE 1.155, JUNE 1988: STATION BLACKOUT

The utilization of BVPS emergency diesel generators as alternate AC (AAC) power sources for coping with station blackout, and the reliability program for these generators follow the guidance of Regulatory Guide 1.155 (June 1988).^{10,11}

Attachment to Unit 1 Updated FSAR

Insert "C"

Paragraph C.3.a

Except for audit frequencies mandated by Title 10 of the Code of Federal Regulations, internal audits of selected aspects of operational phase activities shall be performed with a frequency commensurate with their safety significance and in such a manner as to ensure that audits described in each Unit's Technical Specifications are completed within a period of 2 years (biennially).

ATTACHMENT D-2

Beaver Valley Power Station, Unit No. 2
Proposed Technical Specification Change No. 83

Applicable UFSAR Changes

Affected Pages:

Table 1.8-1 page 14 of 80
 page 15 of 80
 page 76a of 80

BVPS-2 UFSAR

TABLE 1.8-1 (Cont)

Following the guidance of any of the preceding document revisions was based primarily on the revision in effect on the date of the last specification revision wherein the regulatory guide was invoked. Since each revision of the regulatory guide is less restrictive than the foregoing, following the guidance of any of the revisions is considered acceptable.

RG No. 1.32, Rev. 2

UFSAR Reference Sections 7.5, 8.1.5, 8.2, 8.3.1, 8.3.2, 7.5.2.3.1.3

CRITERIA FOR SAFETY-RELATED ELECTRIC POWER SYSTEMS FOR NUCLEAR POWER PLANTS (FEBRUARY 1977)

The design of the safety-related electric power systems for Beaver Valley Power Station - Unit 2 (BVPS-2) follows IEEE Standard 308-1974, and the guidance of Regulatory Guide 1.32, with the following clarifications:

Two immediate access offsite power circuits are provided. Each circuit is designed to be immediately available following a loss of onsite alternating current power supplies so that sufficient power capacity remains for an orderly shutdown and to supply all train related engineered safety feature loads.

Each battery charger that supplies Class IE 125 V dc systems is designed with full capacity and capability to supply the largest combined demands of the various steady state loads while simultaneously providing sufficient power for adequate charging capacity to restore the battery from the design minimum charged state to the charged state irrespective of the BVPS-2 status during which these demands occur.

For test methods, procedures, and intervals for all Class IE battery performance discharge and service tests, refer to the position on Regulatory Guide 1.129.

RG No. 1.33, Rev. 2

UFSAR Reference Sections 13.4, 13.5, 17.2

QUALITY ASSURANCE PROGRAM REQUIREMENTS (OPERATION) (FEBRUARY 1978)

The Quality Assurance Program for the operating phase of Beaver Valley Power Station - Unit 2 will follow the guidance of this regulatory guide with the following clarification:

Paragraph C.2

The applicability of the referenced regulatory guides (1.8, 1.17, 1.28, 1.30, 1.37, 1.38, 1.39, 1.54, 1.58, 1.64, 1.74, 1.88, 1.94,

TABLE 1.8-1 (Cont)

1.116, and 1.123) is as stated in the respective positions on these regulatory guides.

Insert D

RG No. 1.34, Rev. 0

UFSAR Reference Section 5.2.3

CONTROL OF ELECTROSLAG WELD PROPERTIES (DECEMBER 28, 1972)

The guidance provided by this regulatory guide regarding control of electroslog weld properties was followed for fabrication of applicable components for Beaver Valley Power Station - Unit 2.

RG No. 1.35, Rev. 2

INSERVICE INSPECTION OF UNGROUTED TENDONS IN PRESTRESSED CONCRETE CONTAINMENT STRUCTURES (JANUARY 1976)

This regulatory guide is not applicable to Beaver Valley Power Station - Unit 2.

RG No. 1.36, Rev. 0

UFSAR Reference Sections 5.2.3, 6.1.1

NONMETALLIC THERMAL INSULATION FOR AUSTENITIC STAINLESS STEEL (FEBRUARY 23, 1973)

Nonmetallic thermal insulation for austenitic stainless steel used at Beaver Valley Power Station - Unit 2 meets the intent of this regulatory guide. As an alternative to controlled packaging and shipping described in Paragraph C.1, receipt inspection and tests are required by specification. This testing and inspection consists of visual inspection for physical or water damage to all cartons. Damaged cartons are segregated. Potentially contaminated insulation is not accepted, unless randomly selected samples from each carton are shown to be acceptable after being resubjected to the production test outlined in this regulatory guide.

RG No. 1.37, Rev. 0

UFSAR Reference Sections 6.1.1.1, 17.2, 5.2.3.4.1

QUALITY ASSURANCE REQUIREMENTS FOR CLEANING OF FLUID SYSTEMS AND ASSOCIATED COMPONENTS OF WATER-COOLED NUCLEAR POWER PLANTS (MARCH 16, 1973)

Quality assurance requirements for cleaning of fluid systems and associated components at Beaver Valley Power Station - Unit 2 meet the intent of this regulatory guide with the following alternatives:

Attachment to BVPS 2 Updated FSAR

Insert "D"

Paragraph C.4

Except for audit frequencies mandated by Title 10 of the Code of Federal Regulations, internal audits of selected aspects of operational phase activities shall be performed with a frequency commensurate with their safety significance and in such a manner as to ensure that audits described in each Unit's Technical Specifications are completed within a period of 2 years (biennially).

BVPS-2 UFSAR

TABLE 1.8-1 (Cont)

Paragraph C.5.2.2

Beaver Valley Power Station - Unit 2 complies with this section, except that the spectra described in Sections 3.7B.1 and 3.7B.2 are used.

Paragraph C.5.2.3

Beaver Valley Power Station - Unit 2 uses the modal time-history technique to generate floor response spectra. Refer to Section 3.7B.2.

Paragraph C.5.2.4

Beaver Valley Power Station - Unit 2 uses ACI-318-71. This was the code in effect at the time of design. The differences between this code and ACI-318-77 are insignificant.

Paragraph C.6

Quality assurance programs used for the design, manufacture, construction, and inspection of the equipment used in the radwaste management systems are in accordance with a QA Category II classification and the codes and standards specified in the equipment purchase specifications.

RG No. 1.144, Rev. 1

UFSAR Reference Section 17.2

AUDITING OF QUALITY ASSURANCE PROGRAMS FOR NUCLEAR POWER PLANTS
(SEPTEMBER 1980)

Beaver Valley Power Station - Unit 2 (BVPS-2) will meet the intent of Regulatory Guide 1.144 for the auditing of its Quality Assurance Program during the operations phase with the following clarifications and alternatives:

The pre-audit and post-audit conferences required by Sections 4.3.1 and 4.3.3 of ANSI N45.2.12-1977 may be fulfilled by a variety of communications such as telephone conversation.

Add:

Paragraph C.3a.

See RG 1.33 position for internal audit frequency requirements.