

ATTACHMENT A

Beaver Valley Power Station, Unit No. 2
Proposed Technical Specification Change No. 52

Revise the Technical Specifications as follows:

Remove Pages

3/4 3-57
3/4 3-58

Insert Pages

3/4 3-57
3/4 3-58

INSTRUMENTATION

ACCIDENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.8 The accident monitoring instrumentation channels shown in Table 3.3.11 shall be OPERABLE.

APPLICABILITY: MODES 1, 2 and 3.

ACTION

- a. With the number of OPERABLE accident monitoring instrumentation channels less than the Total Number of Channels shown in Table 3.3.11, either restore the inoperable channel(s) to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours except for the PORV(s) which may be isolated in accordance with Specification 3.4.11.
- b. With the number of OPERABLE accident monitoring instrumentation channels less than the Minimum Channels OPERABLE requirements of Table 3.3.11, either restore the inoperable channel(s) to OPERABLE status within 48 hours or be in at least HOT SHUTDOWN within the next 12 hours.
- ~~c. With the number of OPERABLE Reactor Vessel Level Indication System channels less than the required number of channels or the Minimum Channels OPERABLE requirement, restore the inoperable channel(s) to OPERABLE status as per ACTION a or b above as applicable if repair is not feasible, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 14 days that provides action taken, cause of the inoperability, and the plans and schedule for restoring the channels to OPERABLE status. This ACTION statement applies to the first fuel cycle only.~~
- c. With the number of OPERABLE Reactor Coolant System Subcooling Margin Monitor instrumentation channels less than the Minimum Channels OPERABLE requirements of Table 3.3.11, either restore the inoperable channel(s) to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours.
- d. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.8 Each accident monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3-7.

TABLE 3.3-11

ACCIDENT MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>ACTION</u>
1. Pressurizer Water Level	3	2	a, b
2. Auxiliary Feedwater Flow Rate	2 per steam generator	1 per steam generator	a, b
3. Reactor Coolant System Subcooling Margin Monitor	2	1	C A
4. PORV Limit Switch Position Indicator	1/valve	0/valve	a, b
5. PORV Block Valve Limit Switch Position Indicator	1/valve	0/valve	a, b
6. Safety Valve Position Indicator	1/valve	0/valve	a, b
7. Safety Valve Temperature Detector	1/valve	0/valve	a, b
8. Containment Sump Wide Range Water Level	2	1	a, b
9. Containment Wide-Range Pressure	2	1	a, b
10. Reactor Vessel Level Indication System	1 X	1	^a (a, b, c ^a)
11. Core Exit Thermocouples	4/core quadrant	2/core quadrant	a, b

~~*Only ACTION statement c is applicable during the first fuel cycle. ACTION statements a and b are applicable thereafter.~~

ATTACHMENT B

Beaver Valley Power Station, Unit No. 2 Proposed Technical Specification Change No. 52 REVISION OF TECHNICAL SPECIFICATION 3.3.3.8

A. DESCRIPTION OF AMENDMENT REQUEST

The proposed amendment would modify Technical Specification 3.3.3.8 by deleting Action statement c and reducing the total number of channels for Table 3.3-11 Item 10, Reactor Vessel Level Indication System (RVLIS), from 2 to 1. Action statements d and e have been re-annotated to c and d respectively. Table 3.3-11 has also been revised by changing Action d to Action c for Item 3, Reactor Coolant System Subcooling Margin Monitor, deleting Action a applicable to Item 10, and deleting the * note applicable to Item 10 Action c.

B. BACKGROUND

RVLIS was a new system incorporated in BV-2 and throughout the industry as a result of NUREG-0737. BV-1 did not yet have RVLIS technical specification (TS) requirements and the system had not been proven as a reliable operating system when the BV-2 TS was developed. Therefore, Specification 3.3.3.8 Action statement c was incorporated to allow the plant to evaluate and correct any operating deficiencies related to RVLIS during Cycle 1. The * note on Table 3.3-11 was provided to ensure it would be clearly understood that during Cycle 1 only Action c was applicable to RVLIS and for subsequent cycles, Actions a and b would be applied. RVLIS was added to the BV-1 TS by Amendment No. 137 after the system had been installed and operated for a period of time and only specifies one for the total number of channels. This change, proposed for BV-2, also specifies one for the total number of channels based on the justification provided in the NRC safety evaluation for the BV-1 amendment. This results in the same Total No. of Channels and the Minimum Channels Operable for Table 3.3-11 Item 10. Action b is more limiting than Action a, therefore, only Action b will apply when this instrument is inoperable.

C. JUSTIFICATION

Specification 3.3.3.8 Action statement c and the * note on Table 3.3-11 have been deleted since they were only applicable during Cycle 1 and are no longer required. Action statements d and e have been renamed to c and d, respectively, to reflect the deletion of Action c. The total number of channels for RVLIS has been changed from 2 to 1 to reflect the BV-1 requirements. This is a deviation from the 2 channels specified in Generic Letter 83-37, however, as stated in the NRC safety evaluation for BV-1 Amendment No. 137, these instruments are not critical to the operation of the plant and continued plant operation need not be limited when one channel is inoperable.

D. SAFETY ANALYSIS

The proposed change modifies Specification 3.3.3.8, Accident Monitoring Instrumentation, to provide for elimination of an action statement and * note whose applicability has expired, renaming the remaining action statements and changing the total number of channels specified in Table 3.3-11 for RVLIS. Action statement c and the * note on Table 3.3-11 have been deleted since their applicability expired following Cycle 1. Removing Action statement c provides for re-naming Actions d and e to maintain the consistency of TS requirements. Changing the total number of channels specified for RVLIS from 2 to 1 deviates from the two specified in Generic Letter 83-37, however, this is consistent with the NRC safety evaluation issued with BV-1 Amendment No. 137. This deviation is based on the fact that these instruments perform no automatic actions, any procedural actions keyed to specific values readable on these instruments have alternate means available for determining subcooling margin, and the emergency operating procedures instruct the operators on what actions to take either with or without RVLIS. Though these instruments provide additional information, they are not critical to the operation of the plant and are described in UFSAR Section 7.5.2 and are listed in that sections applicable tables as backup instruments. They are provided in TS to ensure periodic calibration is performed and at least one channel is available. Therefore, even though the proposed change does not fully conform with the NRC guidance set forth in Generic Letter 83-37, it does provide sufficient control of RVLIS to ensure safe plant operation and need not limit plant operation when one channel of these instruments is inoperable.

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?

Modifying Specification 3.3.3.8, Accident Monitoring Instrumentation, involves eliminating expired Action statement c and the * note specified in Table 3.3-11 and renaming the remaining action statements. These changes are administrative and do not affect the UFSAR accident analysis. An additional change reduces the total number of RVLIS channels specified in Table 3.3-11 since these are only backup instruments as described in UFSAR Section 7.5.2 and perform no automatic actions. These instruments are provided in TS to ensure periodic calibration is performed and at least one channel is available. These instruments will continue to be maintained in accordance with plant procedures to ensure at least one RVLIS channel is available to perform the required function. Use of RVLIS is not required in the accident analysis, since this is a backup instrument, therefore, the proposed change does 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 changes do not involve plant hardware changes and do not result in a change in the manner in which RVLIS performs its function or assists in plant protection. This change is consistent with the RVLIS requirements previously approved for BV-1. These instruments perform no automatic actions. Additionally, any procedural actions keyed to specific values readable on these instruments have alternate means available for determining subcooling margin and the emergency operating procedures instruct the operators on what actions to take either with or without RVLIS. Though these instruments provide additional information, they are not critical to the operation of the plant, therefore, these changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed changes will not affect any of the plant setpoints or margins to the accident analysis or TS limits. RVLIS is listed in TS 3.3.3.8 to ensure periodic calibration is performed and at least one channel is available. Continued plant operation need not be limited when one RVLIS channel is inoperable since this instrument provides backup information not required to safely operate the plant. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

F. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Based on the above safety analysis, 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. ENVIRONMENTAL EVALUATION

The proposed changes have been evaluated and it has been determined that the changes do not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed changes meet the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22 (b), an environmental assessment of the proposed changes is not required.

ATTACHMENT C

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INSTRUMENTATION

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- c. With the number of OPERABLE Reactor Coolant System Subcooling Margin Monitor instrumentation channels less than the Minimum Channels OPERABLE requirements of Table 3.3.11, either restore the inoperable channel(s) to Operable status within 7 days or be in a least HOT SHUTDOWN within the next 12 hours.
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2. Auxiliary Feedwater Flow Rate	2 per steam generator	1 per steam generator	a, b
3. Reactor Coolant System Subcooling Margin Monitor	2	1	c
4. PORV Limit Switch Position Indicator	1/valve	0/valve	a, b
5. PORV Block Valve Limit Switch Position Indicator	1/valve	0/valve	a, b
6. Safety Valve Position Indicator	1/valve	0/valve	a, b
7. Safety Valve Temperature Detector	1/valve	0/valve	a, b
8. Containment Sump Wide Range Water Level	2	1	a, b
9. Containment Wide-Range Pressure	2	1	a, b
10. Reactor Vessel Level Indication System	1	1	b
11. Core Exit Thermocouples	4/core quadrant	2/core quadrant	a, b