

TABLE 3.3-13 (Continued)

<u>INSTRUMENT</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABILITY</u>	<u>PARAMETER</u>	<u>ACTION</u>
3. Elevated Release (2HVS-RQ109A & B)				
a. Noble Gas Activity Monitor	1	*	Radioactivity Rate Measurement	29, 30 ***
b. Particulate Activity Monitor	1	*		32
c. Process Flow Rate Monitor	1	*	Process Flow Rate Measurement	28
d. Sampler Flow Rate Monitor Device	1	*	Sampler Flow Rate Measurement	28
4. Decontamination Building Vent (2RMQ-RQ301A & B)				
a. Noble Gas Activity Monitor	1	*	Radioactivity Rate Measurement	29
b. Particulate Activity Monitor	1	*		32
c. Process Flow Rate Monitor	1	*	Process Flow Rate Measurement	28
→ * c. Sampler Flow Rate Monitor	1	*	Sampler Flow Rate Measurement	28

← DELETE

\*During release via this pathway.

\*\*\*During purging of reactor containment via this pathway

TABLE 3.3-13 (Continued)

INSTRUMENT	MINIMUM CHANNELS OPERABLE	APPLICABILITY	PARAMETER	ACTION
5. Condensate Polishing Building Vent (2HVL-RQ112A & B)				
a. Noble Gas Activity Monitor	1	*	Radioactivity Rate Measurement	29
b. Particulate Activity Monitor	1	*		32
c. Process Flow Rate Monitor	1	*	Process Flow Rate Measurement	28 ← DELETE
(C) → X Sampler Flow Rate Monitor	1	*	Sampler Flow Rate Measurement	28
6. Waste Gas Storage Vault (2RMQ-RQ303A & B)				
a. Noble Gas Activity Monitor	1	*	Radioactivity Rate Measurement	29
b. Particulate Activity Monitor	1	*		32
c. Process Flow Rate Monitor	1	*	Process Flow Rate Measurement	28 ← DELETE
(C) → X Sampler Flow Rate Monitor	1	*	Sampler Flow Rate Measurement	28
7. Gaseous Waste System Surge Tank Discharge				
a. Oxygen Monitor (2GWS-OA100A & B)	2	**	Oxygen	31

\*During release via this pathway.

\*\*During waste gas decay tank filling operation.

(Proposed wording)

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TABLE 4.3-13 (Continued)

BEAVER VALLEY - UNIT 2

INSTRUMENTCHANNEL  
CHECKSOURCE  
CHECKCHANNEL  
CALIBRATIONCHANNEL  
FUNCTIONAL  
TEST

## 3. Elevated Release (2HVS-RQ109A &amp; B)

a. Noble Gas Activity Monitor

D

M(5),  
P(5)\*\*\*

R(3)(6)

Q(2)

b. Particulate Activity Monitor

W

N/A

N/A

N/A

c. Process Flow Rate Monitor

D

N/A

R

Q

d. Sampler Flow Rate Monitor

D

N/A

R

Q

4. Decontamination Building Vent  
(2RMQ-RQ301A & B)

a. Noble Gas Activity Monitor

D

M(5)

R(3)(6)

Q(2)

b. Particulate Activity Monitor

W

N/A

N/A

N/A

c. Process Effluent Flow Rate  
Monitor

D

N/A

R

Q

← DELETE

C. → ~~X~~ Sampler Flow Rate Monitor

D

N/A

R

Q

5. Condensate Polishing Building Vent  
(2HVL-RQ112A & D)

a. Noble Gas Activity Monitor

D

M(5)

R(3)(6)

Q(2)

b. Particulate Activity Monitor

W

N/A

N/A

N/A

c. Process Flow Rate Monitor

D

N/A

R

Q

← DELETE

C. → ~~X~~ Sampler Flow Rate Monitor

D

N/A

R

Q

(Proposed Working)

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TABLE 4.3-13 (Continued)

BEAVER VALLEY - UNIT 2

INSTRUMENT	CHANNEL CHECK	SOURCE CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST
6. Waste Gas Storage Vault (2RMQ-RQ303A & B)				
a. Noble Gas Activity Monitor	D	M(5)	R(3)(6)	Q(2)
b. Particulate Activity Monitor	W	N/A	N/A	N/A
c. Process Flow Rate Monitor	D	N/A	R	Q
C. → <del>X</del> Sampler Flow Rate Monitor	D	N/A	R	Q
7. Gaseous Waste System Surge Tank Discharge				
a. Oxygen Monitor (2GWS-0A100A & B)	D	N/A	Q(4)	M

← DELETE

(Proposed wording)

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## ATTACHMENT B

### Beaver Valley Power Station, Unit No. 2 Proposed Technical Specification Change No. 61 REVISION OF TABLES 3.3-13 AND 4.3-1 OF SPECIFICATION 3.3.3.10

#### A. DESCRIPTION OF AMENDMENT REQUEST

The proposed amendment would delete the associated process flow rate monitor operability requirements, as specified in Tables 3.3-13 and 4.3-13, for the gaseous effluent monitors 2RMQ-RQ-301, 2RMQ-RQ-303, and 2HVL-RQ-112.

#### B. BACKGROUND

The process flow rate monitors, which would be affected by this proposed change, are used to monitor the flow rate of gaseous effluent from the decontamination building, waste gas storage vault, and the condensate polishing building vent pathways. The Beaver Valley Power Station (BVPS) Unit No. 2 Updated Final Safety Analysis Report (UFSAR) states that the building ventilation system for these three pathways are non-safety related and are not required to perform any safety related function (see Section 9.4.13 and 9.4.16). UFSAR Section 11.3.3 titled "Radioactive Releases", indicates that the source term for these three pathways is not significant. As a result, these pathways are not included in UFSAR tables 11.3-1 through 11.3-4 that list the expected and design releases for each potentially radioactive pathway.

The process flow rate monitor for the condensate polishing building vent pathway has had operational difficulties since initial plant operation in mid 1987. The velocity probe for this monitor was installed near an air stream disturbance resulting in erratic readouts from the monitor. This factor has resulted in Unit No. 2 entering technical specification action statements for this monitor at various times requiring additional surveillance activities to be conducted. Modifications to resolve this problem have been estimated to be costly and not desirable based on the safety significance of this particular monitor.

#### C. JUSTIFICATION

The process flow rate operability requirements for 2RMQ-RQ-301, 2RMQ-RQ-303, and 2HVL-RQ-112 can be removed from the BVPS Unit No. 2 technical specifications with no adverse effects on the Offsite Dose Calculation Manual (ODCM) dose and dose rate calculations. BVPS Unit No. 1 and Unit No. 2 are currently using, and will continue to use, design maximum system flow rates in ODCM dose and dose rate calculations rather than the process monitor flow rates observed during normal plant operations. The 1989 maximum organ dose for gaseous releases due to particulates and radioiodines from these three pathways resulted in less than 0.1% of the combined Unit Nos. 1 and 2 technical specification yearly limit of 15 mrem for each unit. The Unit No. 2 UFSAR

indicates that the source term for these three pathways are not significant. These monitors are not used in any BVPS UFSAR accident analysis for radioactive releases from a system or component. These three process flow rate monitors are not used to assess plant conditions during and following an accident.

#### D. SAFETY ANALYSIS

The proposed removal of the three process flow rate monitors from Tables 3.3-13 and 4.3-13 of the BVPS Unit No. 2 technical specifications does not significantly affect safe operation of Unit No. 2. These three monitors are not considered in any accident analysis assumptions. The ventilation system associated with each monitor is non-safety related and is not required to perform any safety related function. Additionally, these monitors are not used to assess plant conditions during or following an accident. A postulated monitor failure will not result in increased offsite doses because design maximum system flow rates are used for ODCM dose calculations. Additionally, it has been determined that the associated effluent pathways are not capable of producing a source term in excess of the 10 CFR 20 and 10 CFR 50 Appendix I limits. Therefore, this change is considered safe since no credit is taken for these monitors in mitigating the consequences of an accident. Also, monitor failure will not result in an increased offsite dose or adversely affect our ability to conservatively estimate offsite doses. And finally, the associated effluent pathways are not capable of producing a source term in excess of prescribed limits.

#### 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?

This proposed change cannot increase the probability of an accident previously evaluated since the process flow rate monitors are not considered in any accident analysis. The ventilation system associated with each process flow rate monitor is non-safety related and not required to perform any safety related function. The radiological consequences are not effected during an accident since these monitors are not used to assess plant conditions during or following an accident.

Therefore this 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 failure of these process flow rate monitors will not modify plant response and therefore will not create a new type of accident. Failure of these monitors would be recognized by the operators by failure alarms and/or monitor diagnostics. A monitor failure will not result in increased offsite dose because design maximum system flow rates are used for ODCM dose calculations. The failure of these monitors will not result in a malfunction of any other equipment. As such, radiological consequences would not be effected by monitor failure.

Therefore, this 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 margin of safety is not reduced because design maximum system flow rates are used in ODCM dose calculations. These flow rates are used in lieu of the flow rates observed from the process flow rate monitors during normal plant operation. There would be no change to the offsite doses as a result of this proposed change and offsite doses would still be less than 10 CFR 20 and 10 CFR 50 Appendix I limits. The associated effluent pathways are not capable of producing a source term in excess of the 10 CFR 20 and 10 CFR 50 Appendix I limits.

Therefore, this proposed change does not involve a significant reduction in a margin of safety.

F. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

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



ATTACHMENT C

Beaver Valley Power Station, Unit No. 2  
Proposed Technical Specification Change No. 61

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TABLE 3.3-13 (Continued)

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a. Noble Gas Activity Monitor	1	*	Radioactivity Rate Measurement	29, 30 ***
b. Particulate Activity Monitor	1	*		32
c. Process Flow Rate Monitor	1	*	Process Flow Rate Measurement	28
d. Sampler Flow Rate Monitor Device	1	*	Sampler Flow Rate Measurement	28
4. Decontamination Building Vent (2RMQ-RQ301A & B)				
a. Noble Gas Activity Monitor	1	*	Radioactivity Rate Measurement	29
b. Particulate Activity Monitor	1	*		32
c. Sampler Flow Rate Monitor	1	*	Sampler Flow Rate Measurement	28

\*During release via this pathway.

\*\*\*During purging of reactor containment via this pathway.

TABLE 3.3-13 (Continued)

<u>INSTRUMENT</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABILITY</u>	<u>PARAMETER</u>	<u>ACTION</u>
5. Condensate Polishing Building Vent (2HVL-RQ112A & B)				
a. Noble Gas Activity Monitor	1	*	Radioactivity Rate Measurement	29
b. Particulate Activity Monitor	1	*		32
c. Sampler Flow Rate Monitor	1	*	Sampler Flow Rate Measurement	28
6. Waste Gas Storage Vault (2RMQ-RQ303A & B)				
a. Noble Gas Activity Monitor	1	*	Radioactivity Rate Measurement	29
b. Particulate Activity Monitor	1	*		32
c. Sampler Flow Rate Monitor	1	*	Sampler Flow Rate Measurement	28
7. Gaseous Waste System Surge Tank Discharge				
a. Oxygen Monitor (2GWS-OA100A & B)	2	**	Oxygen	31

\*During release via this pathway.

\*\*During waste gas decay tank filling operation.

TABLE 4.3-13 (Continued)

<u>INSTRUMENT</u>	<u>CHANNEL CHECK</u>	<u>SOURCE CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>CHANNEL FUNCTIONAL TEST</u>
3. Elevated Release (2HVS-RQ109A & B)				
a. Noble Gas Activity Monitor	D	M(5), P(5)***	R(3) (6)	Q(2)
b. Particulate Activity Monitor	W	N/A	N/A	N/A
c. Process Flow Rate Monitor	D	N/A	R	Q
d. Sampler Flow Rate Monitor	D	N/A	R	Q
4. Decontamination Building Vent (2RMQ-RQ301A & B)				
a. Noble Gas Activity Monitor	D	M(5)	R(3) (6)	Q(2)
b. Particulate Activity Monitor	W	N/A	N/A	N/A
c. Sampler Flow Rate Monitor	D	N/A	R	Q
5. Condensate Polishing Building Vent (2HVL-RQ112A & B)				
a. Noble Gas Activity Monitor	D	M(5)	R(3) (6)	Q(2)
b. Particulate Activity Monitor	W	N/A	N/A	N/A
c. Sampler Flow Rate Monitor	D	N/A	R	Q

TABLE 4.3-13 (Continued)

<u>INSTRUMENT</u>	<u>CHANNEL CHECK</u>	<u>SOURCE CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>CHANNEL FUNCTIONAL TEST</u>
6. Waste Gas Storage Vault (2RMQ-RQ303A & B)				
a. Noble Gas Activity Monitor	D	M(5)	R(3) (6)	Q(2)
b. Particulate Activity Monitor	W	N/A	N/A	N/A
c. Sampler Flow Rate Monitor	D	N/A	R	Q
7. Gaseous Waste System Surge Tank Discharge				
a. Oxygen Monitor (2GWS-OA100A & B)	D	N/A	Q(4)	M