

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of) UNIT NO. 1
) Docket No. 50-334
Duquesne Light Company) License No. DPR-66
Beaver Valley Power Station)

APPLICATION FOR AMENDMENT
TO OPERATING LICENSE

Pursuant to Section 50.90 of the regulations of the U.S. Nuclear Regulatory Commission, Duquesne Light Company hereby requests that the operating license be amended to incorporate a temporary license condition that would extend certain technical specification 18-month surveillance intervals to coincide with the ninth refueling outage.

The proposed operating license change is set forth in Attachment A to this application. A safety analysis and no significant hazard evaluation is set forth in Attachment B. Typed replacement pages for the operating license are included in Attachment C. Based on the guidance provided by the Commission, the proposed changes have been determined to involve no significant hazards consideration in accordance with 10 CFR 50.92.

WHEREFORE, Applicant respectfully requests that the operating license be amended in the form attached hereto as Attachment A.

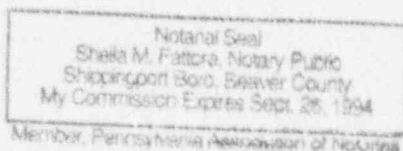
Duquesne Light Company

By J.D. Sieber
J.D. Sieber
Vice President
Nuclear Group

Subscribed and sworn to before me

on this 18th day of August, 1992

Sheila M. Fattore



ATTACHMENT A

Beaver Valley Power Station, Unit No. 1
Proposed Operating License Change No. 198
LICENSE CONDITION 2.C(9)

Add the following as License Condition 2.C(9):

- (9) Surveillance Interval Extension
The performance interval for those surveillance requirements identified in the licensee's request for surveillance interval extension dated August 18, 1992, shall be extended to 24 months to coincide with the Cycle 9 refueling outage.

ATTACHMENT B

Beaver Valley Power Station, Unit No. 1 Proposed Operating License Change No. 198 CYCLE 9 SURVEILLANCE INTERVAL EXTENSION

A. DESCRIPTION OF AMENDMENT REQUEST

The proposed amendment would extend the 18 month surveillance interval for those surveillance requirements identified in Attachment D to coincide with completion of the ninth refueling outage.

B. BACKGROUND

Cycle 9 was designed for a cycle length of 514 effective full power days. This is approximately equal to 20 months of power operation with an 85% capacity factor. Cycle 9 was to begin operation in June 1991 and was expected to end in February 1993, however, due to unexpected delays, plant operation actually began in the latter part of July. In addition, during the first four and a half months of operation, the plant did not operate for six weeks due to unscheduled outages. As a result of these delays, the ninth refueling outage has been rescheduled to begin April 2, 1993. This schedule will permit optimum fuel burnup before the next refueling outage but will result in certain technical specification surveillance intervals (plus technical specification 4.0.2 allowable extensions) expiring prior to the beginning of the 1993 outage.

C. JUSTIFICATION

The proposed change is temporary and allows a one time extension of specific 18 month surveillance requirements for Cycle 9 to allow surveillance testing to coincide with the ninth refueling outage. The surveillance requirements for which an extension is required can not be performed during power operation and would therefore require an otherwise unnecessary plant shutdown to complete. The surveillance interval identified in Surveillance Requirement 4.4.5.3 for steam generator category C-3 inspection provides a specific time limit where the relaxation provided by Specification 4.0.2 may not apply, therefore, a surveillance interval extension is requested for this item. The maximum surveillance interval increase during which the plant is operating at power, will be less than three months and will not affect the reliability established by surveillance testing performed at the other intervals. Should an outage of sufficient length occur prior to issuance of this amendment, DFC will complete as many of the required surveillances as is practical.

D. SAFETY ANALYSIS

Technical Specification 4.0.2 is an administrative control which ensures that surveillance tests are performed periodically and defines a reasonable extension period for such testing. The basis of this specification describes the surveillance requirements as "sufficient to ensure that the reliability

associated with the surveillance activity is not significantly degraded beyond that obtained from the nominal specified interval." The margin of safety assumed by the required refueling surveillances may be slightly reduced by extending the surveillance intervals. However, because the maximum allowable extension is limited to the end of the refueling outage, we have concluded that the reliability defined by the normal surveillance intervals (e.g., daily, weekly, monthly) will not be significantly reduced by the extension. This conclusion is based on the following:

- Current monitoring of instrumentation and ongoing technical specification surveillance tests provide assurance that the equipment involved in the extended surveillance tests will remain in an operable condition until testing is performed at the next refueling outage.
- Periodic surveillance tests have been performed since the last refueling outage to monitor system and component performance and to detect any significant degradation. Surveillance testing will continue to be performed during the requested extension interval which provides added assurance that the reliability of equipment associated with the extended surveillance will not be significantly degraded by this one time extension.
- Historically, the electronic components in the reactor protection system and engineered safety features actuation system have shown a very high degree of reliability.
- Section XI of the ASME Code defines a refueling interval as 18, but no more than 24 months. Based on this definition, all ISI testing, required at refueling intervals, does not have to be performed until the unit is shutdown for the refueling outage.

This change is consistent with short term changes granted by the NRC for other plants (e.g., BV-2 Cycle 1) to extend the 18 month surveillance intervals to a refueling outage. Following the ninth refueling outage the plant will continue to comply with the 18 month surveillance intervals for future operating cycles. The proposed changes do not affect the UFSAR since the changes are temporary and only apply for Cycle 9. Therefore, based on the above, this change has been determined to be safe and will not reduce the safety of the plant.

E. NO SIGNIFICANT HAZARDS EVALUATION

The no significant hazard considerations involved with the proposed amendment have been evaluated, focusing on the three standards set forth in 10 CFR 50.92(c) as quoted below:

The Commission may make a final determination, pursuant to the procedures in paragraph 50.91, that a proposed amendment to an operating license for a facility licensed under paragraph 50.21(b) or paragraph 50.22 or for a testing facility involves no significant hazards consideration, if operation of the facility in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

The following evaluation is provided for the no significant hazards consideration standards.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed change is temporary and allows a one time extension of specific 13 month surveillance requirements for Cycle 9 to allow surveillance testing to coincide with the ninth refueling outage. The proposed surveillance interval extension is short and will not cause a significant reduction in system reliability nor affect the ability of the systems to perform their design function. Current monitoring of plant conditions and continuation of the surveillance testing required during normal plant operation will continue to be performed as usual to assure conformance with technical specification operability requirements. The proposed change does not affect the UFSAR and is consistent with changes granted for other plants, therefore, this 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?

Extending the surveillance interval for the performance of specific testing will not create the possibility of any new or different kind of accidents. No change is required to any system configurations, plant equipment or analyses. Therefore, this change will 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?

Surveillance interval extensions will not impact any plant safety analyses since the assumptions used will remain unchanged. The safety limits assumed in the accident analyses and the design function of the equipment required to mitigate the consequences of any postulated accidents will not be changed since only the 18 month surveillance test interval is being extended. Extending the surveillance test interval for the performance of these specific tests could slightly reduce the margin of safety derived from required surveillances. However, surveillance testing performed during normal plant operation will continued to be performed as usual to assure conformance with the technical specification operability requirements. Therefore, the plant will be maintained within the analyzed limits and the proposed extension will not significantly reduce 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.