

Lew W. Myers  
Senior Vice President

June 19, 2000  
L-00-079

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U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555-0001

**Subject: Beaver Valley Power Station, Unit No. 1 and No. 2  
BV-1 Docket No. 50-334, License No. DPR-66  
BV-2 Docket No. 50-412, License No. NPF-73  
Supplement to License Amendment Request Nos. 280 and 151**

On May 12, 2000, FirstEnergy Nuclear Operating Company (FENOC) requested NRC review and approval of proposed changes to the Beaver Valley Power Station (BVPS) Unit 1 and Unit 2 Updated Final Safety Analysis Reports (UFSARs) (Letter L-00-008). The proposed revisions to the UFSARs addressed information on design basis accident radiological doses as a result of the recent complete reevaluation of all BVPS dose calculations.

Additional information regarding the conclusions has been added to the No Significant Hazards Evaluation as verbally requested by the NRC. It has also been found that the categorical exclusion as provided by 10 CFR 51.22(c)(9) may not be applicable. Therefore, this letter provides replacement Attachment B pages B-14 through B-16 which supersede these pages from the original License Amendment Request Nos. 280 and 151 for BVPS Unit 1 and Unit 2, respectively. Please disregard the original pages B-14 through B-16.

If there are any questions concerning this matter, please contact Mr. Thomas S. Cosgrove, Manager, Licensing at 724-682-5203.

Sincerely,



Lew W. Myers

- c: Mr. D. S. Collins, Project Manager
- Mr. D. M. Kern, Sr. Resident Inspector
- Mr. H. J. Miller, NRC Region I Administrator
- Mr. D. A. Allard, Director BRP/DEP
- Mr. L. E. Ryan (BRP/DEP)
- Ms. M. E. O'Reilly (FirstEnergy Legal Department)

AD53

NRR-091

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I, Lew W. Myers, being duly sworn, state that I am Senior Vice President of FirstEnergy Nuclear Operating Company (FENOC), that I am authorized to sign and file this submittal with the Nuclear Regulatory Commission on behalf of FENOC, and that the statements made and the matters set forth herein pertaining to FENOC are true and correct to the best of my knowledge and belief.

FirstEnergy Nuclear Operating Company

  
Lew W. Myers  
Senior Vice President - FENOC

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF BEAVER

Subscribed and sworn to me, a Notary Public, in and for the County and State above named, this 19 th day of June, 2000.



My Commission Expires:

Notarial Seal  
Sheila M. Fattore, Notary Public  
Shippingport Boro, Beaver County  
My Commission Expires Sept. 30, 2002  
Member, Pennsylvania Association of Notaries

dose for BVPS Unit 1 Major Secondary System Pipe Rupture DBA increases from 26.0 rem to 28.9 rem, which remains within the Standard Review Plan limit of 30 rem. This value remains below the Standard Review Plan limit in accordance with the steam generator alternate repair criteria as previously approved via BVPS Unit 1 License Amendment No. 205.

Thus, since each dose increase remains within the applicable DBA previously approved regulatory limit, it is recommended that the proposed UFSAR changes in Attachments A-1 and A-2 be approved for BVPS Unit 1 and Unit 2, respectively.

E. NO SIGNIFICANT HAZARDS EVALUATION

The no significant hazard considerations involved with the proposed amendment have been evaluated. The evaluation focused 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?

Following a reevaluation of the calculated dose values for BVPS Unit 1 and Unit 2 design basis accidents (DBAs) as described in their respective UFSAR, several calculated dose values were identified to be increased. These increases were small and remained within the applicable DBA previously approved regulatory limit.

The increases for each DBA were as a result of revised plant data being used in the dose calculation, revised calculation assumptions, or new methodology. These changes were not the result of plant hardware changes. The changes were intended to ensure that accurate, current and conservative licensing basis information and assumptions were used for DBA dose analyses. The UFSAR changes are proposed to reflect the revised analyses results for the Unit 1 and Unit 2 UFSAR.

Since the calculated DBA radiological doses remain within the applicable DBA previously approved regulatory limit, these calculated dose values do not involve a significant increase in the probability or consequences of an accident as previously evaluated in the BVPS Unit 1 and Unit 2 UFSAR.

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

BVPS Unit 1 and Unit 2 calculations which are used to determine DBA calculated dose values were revised. The changes were as a result of revised plant data being used in the dose calculation, revised calculation assumptions or new methodology. The changes were intended to ensure that accurate, current and conservative licensing basis information and assumptions were used for DBA dose analyses. The DBA events themselves remain the same postulated events as previously described within the BVPS Unit 1 and Unit 2 UFSARs. The revised dose calculations do not create the possibility of a new or different kind of accident from the DBA accidents previously evaluated in the UFSAR. These changes were not the result of plant hardware changes. The changes were only in the calculations. The UFSAR changes are proposed to reflect the revised analyses results for the Unit 1 and Unit 2 UFSAR.

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

This amendment request addresses only proposed changes to the Unit 1 and Unit 2 UFSAR, which was determined to involve an Unreviewed Safety Question pursuant to 10 CFR 50.59. This request does not propose modifying any Technical Specification criteria. This request proposes that several calculated dose values for BVPS Unit 1 and Unit 2 DBAs be increased following a reevaluation of their design basis calculations. These proposed increases are small and remained within the applicable DBA previously approved regulatory limit. Thus, the proposed changes to the UFSAR which originated from revised BVPS DBA dose calculations does not involve a significant reduction in the margin of safety for BVPS Unit 1 and Unit 2 because the Technical Specifications will not be altered

and the increase in calculated dose values is small and remains within regulatory approved limits.

F. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission has provided guidance concerning the application of standards in 10 CFR 50.92 by providing certain examples (March 6, 1986 51FR7751) of amendments that are considered not likely to involve a significant hazards consideration. The proposed amendment is similar to example (vi) stated in the March 6, 1986 Federal Register Notice, in that this proposed change results in some increase in the consequences of a previously analyzed accident, but where the results of the change are clearly within acceptable criteria. The proposed increases in calculated doses remain within the applicable DBA previously approved regulation limits. Based on the considerations expressed above, it is concluded that the activities associated with this license amendment request satisfy the requirements of 10 CFR 50.92(c) and, accordingly, a no significant hazards consideration finding is justified.

G. ENVIRONMENTAL CONSIDERATION

This license amendment request changes the calculated design basis accident dose values identified in the BVPS Unit 1 and Unit 2 UFSARs. The identified increased dose values remain below the dose requirements of 10 CFR 100 and 10 CFR 50, GDC 19. It has been determined that this license amendment request involves no significant increase in the amounts, and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. This license amendment request may change requirements with respect to installation or use of a facility component located within the restricted area; however, the category of this licensing action does not individually or cumulatively have a significant effect on the human environment. This amendment is necessary to allow correction of the licensing basis to reflect corrected and conservative input and assumptions used in the BVPS Unit 1 and Unit 2 analyses for design basis accidents. Accordingly, this license amendment request has no potential environmental impact.

H. UFSAR CHANGES

UFSAR changes are required. See Attachments A-1 and A-2.