

August 18, 2000

Mr. L. W. Myers
Senior Vice President
Beaver Valley Power Station
Post Office Box 4
Shippingport, PA 15077

SUBJECT: BEAVER VALLEY 1 AND 2 - CORRECTION TO SAFETY EVALUATION FOR AMENDMENT NOS. 231 AND 111 TO FACILITY OPERATING LICENSE NOS. DPR-66 AND NPF-73 (TAC NOS. MA6377 AND MA6378)

Dear Mr. Myers:

On July 11, 2000, the Nuclear Regulatory Commission (NRC) issued Amendment No. 231 to Facility Operating License No. DPR-66 and Amendment No. 111 to Facility Operating License No. NPF-73 for the Beaver Valley Power Station, Unit Nos. 1 and 2 (BVPS-1 and BVPS-2). Among other changes, these amendments revised the technical specification (TS) surveillance frequency for the quench and recirculation spray system nozzle air flow tests based on the guidance provided in Generic Letter 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements For Testing During Power Operation," as requested by Duquesne Light Company's (DLC) application dated July 15, 1999.

On the date of the July 15, 1999, letter, DLC was the licensed operator for BVPS-1 and BVPS-2. On December 3, 1999, DLC's ownership interests in BVPS-1 and BVPS-2 were transferred to the Pennsylvania Power Company and DLC's operating authority for BVPS-1 and BVPS-2 was transferred to FirstEnergy Nuclear Operating Company (FENOC). By letter dated December 13, 1999, FENOC requested that the NRC continue to review and act upon all requests before the Commission that had been submitted by DLC. Accordingly, the NRC staff completed its review of the requested changes and issued them as Amendment Nos. 231 and 111.

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Subsequent to the issuance of the amendment, an error was identified in Section 3.1 of the safety evaluation (SE) which was issued with the amendments. This section of the SE discussed changes to TS 4.6.2.1.d and 4.6.2.2.f which require FENOC to perform air or smoke flow tests through the quench and recirculation systems spray nozzles. These surveillance requirements are qualitative checks to ensure that each spray nozzle is unobstructed and provide assurance that spray coverage of the containment during an accident is not degraded. The SE incorrectly identified TS 4.6.2.1.d as applying to Unit 1 only and TS 4.6.2.2.f as applying to Unit 2 only when, in fact, both TSs apply to both units. Notwithstanding this error, the conclusion of the SE regarding the proposed changes to TS 4.6.2.1.d and 4.6.2.2.f is unaffected. Accordingly, a revised page 2 of the SE to correct this error is enclosed with this letter.

Sincerely,

/RA/

Daniel S. Collins, Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-334 and 50-412

Enclosure: Safety Evaluation, Page 2

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Daniel S. Collins, Project Manager, Section 1
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NUREG-1366, "Improvements to Technical Specifications Surveillance Requirements," Item 8.1 "Containment Spray System," dated December 1992.

3.0 EVALUATION

3.1 Quench and Recirculation Systems Nozzle Air Flow Test Changes

The TS 4.6.2.1.d and TS 4.6.2.2.f for BVPS-1 and BVPS-2 require FENOC to perform air or smoke flow tests through the spray nozzles. The surveillance requirements are qualitative checks to ensure that each spray nozzle is unobstructed and provide assurance that spray coverage of the containment during an accident is not degraded. The BVPS-1 and BVPS-2 containment spray system piping and nozzles are passive devices that are not normally exposed to fluids or debris. The system piping and nozzles are made of stainless steel, which is highly resistant to corrosion, especially in a low-stress application such as at BVPS-1 and BVPS-2.

NUREG-1366 states that it is unlikely that nozzles will become obstructed if the surveillance interval is extended to 10 years because the system is not subjected to a corrosive environment and the system will not normally be open or exposed to debris which could foul the nozzles. NUREG-1366 mentions that industry operating experience history was evaluated to determine the cause of problems discovered when performing this surveillance. In all cases, the problems discovered were related to construction and not the result of normal operation. In GL 93-05, the NRC noted that a San Onofre, Unit 1 containment spray system air flow test indicated that several nozzles were blocked. The resulting investigation found that seven nozzles were clogged with sodium silicate, a coating material that was applied to the carbon steel containment spray system piping at San Onofre in 1977. However, as stated above, the BVPS-1 and BVPS-2 containment spray system piping and nozzles are stainless steel and are not coated.

Since original construction the containment spray system nozzles have been tested satisfactorily four times on BVPS-1 and three times on BVPS-2. This supports the judgement that the construction problems identified in NUREG-1366 do not exist at BVPS-1 and BVPS-2. Also the tests show that the spray nozzles did not become obstructed due to any other reason over a period of normal operation.

3.2 Axial Flux Difference Terminology Changes

TS 3.2.1 contains the requirements applicable to the AFD, which is defined as the difference in normalized flux signals between the top and bottom halves of a two-section excore neutron detector. Action a of TS 3.2.1 is applicable when the indicated AFD is outside of the target band which is specified in the Core Operating Limits Report (COLR). However, the first sentence of Action a.2.a.2 refers to the indicated AFD being within the target band, thus contradicting the plant condition for which the action is intended to be applied. The intent of this sentence is to express the plant condition when the AFD is outside the target band but within the acceptable operating limits specified for AFD in the COLR.

The proposed change would revise Action a.2.a.2 to replace the phrase "target band" with the phrase "acceptable operation limits specified in the COLR," which is the terminology used in the corresponding action condition of the Westinghouse Improved Standard Technical

Beaver Valley Power Station, Units 1 and 2

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