

October 13, 2000

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

SUBJECT: BEAVER VALLEY POWER STATION UNIT 2 - ISSUANCE OF AMENDMENT RE:  
REVISION OF 18 MONTHS SURVEILLANCE CRITERIA FOR CONTAINMENT  
RELAY TESTING (TAC NO. MA9865)

Dear Mr. Myers:

The Commission has issued the enclosed Amendment No. 118 to Facility Operating License No. NPF-73 for the Beaver Valley Power Station, Unit 2 (BVPS-2). This amendment consists of changes to the Technical Specifications and associated Bases in response to your application dated September 1, 2000, which submitted License Amendment Request No. 160.

The amendment revises certain 18-month surveillance requirements by eliminating the condition that testing be conducted either during shutdown, or during cold shutdown or refueling mode (i.e., shutdown conditions). Elimination of the requirement to perform testing during shutdown conditions will allow credit to be taken for testing that is currently being performed at power to meet the 18-month surveillance requirement.

Proper planning regarding submission of license amendment requests is necessary to allow sufficient allocation of Nuclear Regulatory Commission (NRC) and FirstEnergy Nuclear Operating Company (FENOC) resources. FENOC submitted this request on September 1, 2000, and requested issuance by October 13, 2000, to support startup of BVPS-2 from a refueling outage. In light of the importance of this issue in supporting the desired startup date, the NRC staff feels that sufficient preparation and planning was not given to this issue by FENOC.

A copy of the related safety evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

***/RA by Peter S. Tam for/***

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

Docket No. 50-412

Enclosures: 1. Amendment No. 118 to NPF-73  
2. Safety Evaluation

cc w/encls: See next page

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\*See previous concurrence

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PENNSYLVANIA POWER COMPANY  
OHIO EDISON COMPANY  
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY  
THE TOLEDO EDISON COMPANY  
FIRSTENERGY NUCLEAR OPERATING COMPANY  
DOCKET NO. 50-412  
BEAVER VALLEY POWER STATION, UNIT 2  
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 118  
License No. NPF-73

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by FirstEnergy Nuclear Operating Company, et al. (the licensee) dated September 1, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-73 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 118 , and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated in the license. FENOC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

*/RA/*

Marsha Gamberoni, Chief, Section 1  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: October 13, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 118

FACILITY OPERATING LICENSE NO. NPF-73

DOCKET NO. 50-412

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

3/4 5-5  
3/4 6-10  
3/4 6-13  
3/4 6-14  
3/4 6-16  
B 3/4 5-1a  
B 3/4 6-11  
B 3/4 6-12  
B 3/4 6-13

Insert

3/4 5-5  
3/4 6-10  
3/4 6-13  
3/4 6-14  
3/4 6-16  
B 3/4 5-1a  
B 3/4 6-11  
B 3/4 6-12  
B 3/4 6-13

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 118 TO FACILITY OPERATING LICENSE NO. NPF-73  
PENNSYLVANIA POWER COMPANY  
OHIO EDISON COMPANY  
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY  
THE TOLEDO EDISON COMPANY  
FIRSTENERGY NUCLEAR OPERATING COMPANY  
BEAVER VALLEY POWER STATION, UNIT 2  
DOCKET NO. 50-412

## 1.0 INTRODUCTION

By letter dated September 1, 2000, FirstEnergy Nuclear Operating Company (FENOC) submitted a request for changes to the Beaver Valley Power Station, Unit 2, Technical Specifications (TSs). The requested changes will revise certain 18-month TS surveillance requirements (SR) by eliminating the provisions that the testing be done during shutdown, and enhancing the associated Bases. The proposed license amendment will result in a substantial reduction in the number of components that must be tested during shutdown.

Some surveillances that are currently required to be performed during shutdown are performed on systems that are most needed during shutdown. These surveillances are better performed during power operation. Thus, a reduction of the number of components that must be tested during shutdown will improve the availability of systems important for maintaining the plant in a safe shutdown condition. An example of such systems is the residual heat removal system.

The staff evaluated the licensee's proposal as set forth in the following sections.

## 2.0 EVALUATION

### 2.1 Proposed TS Changes

There are numerous surveillances that are required by the Technical Specifications to be performed during shutdown. Many of these surveillances involve complex plant configurations that can be both a burden to personnel and a safety risk. Some surveillances required during shutdown are redundant to surveillances required at power, and, are thus an unnecessary burden to personnel. If these surveillances can be safely performed at power, and allowing credit to be applied to surveillances required during shutdown, many redundant surveillances

during shutdown would be eliminated without any adverse impact on plant safety. Tests that cannot be safely performed at power will, of course, continue to be performed during shutdown.

The requirement to perform certain surveillances only during shutdown is intended to ensure that these surveillances are performed consistent with safe plant operation. However, many components affected by such restriction are designed such that they may also be safely tested at power. In fact, many of the affected components are routinely tested at power in accordance with quarterly surveillance requirements. For example, the quarterly engineered safety feature actuation system (ESFAS) instrumentation SR that tests relay operation (SR 4.3.2.1.1) requires numerous components to be actuated. The quarterly ESFAS SR will in most cases satisfy the 18-month surveillance requirement to verify component actuation or valve cycling.

In Generic Letter (GL) 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," the NRC staff specifically recommends the elimination of the condition "during shutdown" from SRs. It states:

The staff concludes that the TS need not restrict surveillances as only being performed during shutdown. Nevertheless, safety dictates that when refueling interval surveillances are performed during power operation, licensees give proper regard for their effect on the safe operation of the plant. If the performance of a refueling interval surveillance during plant operation would adversely affect safety, the licensee should postpone the surveillance until the unit is shutdown for refueling or is in a condition or mode that is consistent with the safe conduct of that surveillance.

Specifically, the licensee proposed to make these changes:

1. TS 3/4.5.2, "ECCS Subsystems -  $T_{avg} \geq 350^{\circ}\text{F}$ ," in SR 4.5.2.f -- delete the term "during shutdown," and in SR 4.5.2.f.1, to avoid confusion, delete the term "that is not testable during plant operation";
2. TS 3/4.6.2.1, "Containment Quench Spray System," in SR 4.6.2.1.c -- delete the term "during shutdown," and in SR 4.6.2.1.c.1, to avoid confusion, delete the term "that is not testable during plant operation";
3. TS 3/4.6.2.2, "Containment Recirculation Spray System," in SR 4.6.2.2.e -- delete the term "during shutdown," and in SR 4.6.2.2.e.1, to avoid confusion, delete the term "that is not testable during plant operation";
4. TS 3/4.6.2.3, "Chemical Addition System," in SR 4.6.2.3.d -- delete the term "during shutdown," in SR 4.6.2.3.d.1, to avoid confusion, delete the term "that is not testable during plant operation"; and,
5. TS 3/4.6.3.1, "Containment Isolation Valves," SR 4.6.3.1.2 -- delete the term "during the COLD SHUTDOWN or REFUELING MODE."

The staff has stated its position again in Standard Technical Specifications (STS), NUREG-1431, changing some SR testing requirements that have traditionally been stipulated for performance during shutdown to allow them to be performed at power. The licensee's

proposed changes are consistent with the staff's stated position in NUREG-1431 and GL 91-04. The proposed changes also will allow, in some cases, for the reduction of redundant testing. The proposed changes will thus result in reduction of the risks associated with performing surveillances during shutdown, and will improve the availability of systems important to maintaining the plant in a safe shutdown condition. Therefore, the staff finds the licensee's proposed changes to be acceptable.

In addition to the above changes, a typographical error in SR 4.6.2.3.d.2 is corrected. The SR is changed from the current "...each automatic valve in the flow path actuates to its correct *postion* on a test signal" to "...each automatic valve in the flow path actuates to its correct *position* on a test signal" (emphasis added). This change is a correction of a spelling error, and is appropriate for the context in which the wording appears. Therefore, this change is acceptable.

## 2.2 Proposed TS Bases Changes

In addition to the proposed SR changes, the licensee proposed the following additional wording to each of the associated TS Bases sections:

The 18-month surveillance interval is consistent with the expected length of fuel cycles and allows for component testing to be performed during plant shutdown conditions if necessary to avoid a plant transient that could occur if the component were tested at power. However, for those components that may be safely tested at power, the 18-month surveillance may be met by performing the required testing at power.

The NRC staff has no objection to these proposed additions to the TS Bases.

## 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendment. The State official had no comments.

## 4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes surveillance requirements. The staff has determined that the amendment 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. The staff has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (65 FR 55056). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

## 5.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Date: October 13, 2000

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