

Lew W. Myers
Senior Vice President724-682-5234
Fax: 724-643-8069August 13, 2001
L-01-103U. 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
License Amendment Request Nos. 294 and 166
Application For Technical Specification Improvement to
Eliminate Requirements for Post Accident Sampling System
Using the Consolidated Line Item Improvement Process**

In accordance with the provisions of 10 CFR 50.90, FirstEnergy Nuclear Operating Company (FENOC) requests an amendment to the above licenses in the form of changes to the Technical Specifications for Beaver Valley Power Station (BVPS), Unit No. 1 and No. 2.

The proposed amendment would delete Technical Specification (TS) 6.8.4, Post Accident Monitoring Program, and thereby eliminate the requirements to have and maintain the Post Accident Sampling System (PASS) at BVPS, Unit No. 1 and No. 2. The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this Technical Specification improvement was announced in the Federal Register on October 31, 2000 as part of the Consolidated Line Item Improvement Process (CLIIP).

BVPS Review Committees have reviewed the changes. Attachment A provides the existing Technical Specification pages marked-up to show the proposed change. Attachment B provides a description of the proposed change, the requested confirmation of applicability, and plant specific verifications. Attachment C provides a summary of the licensing commitments made in this submittal.

FENOC requests approval of the proposed License Amendment by December 15, 2001, with the amendment being implemented 180 days following the effective date of the amendment. The approval date was administratively selected (consistent with requests

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from other licensees) to allow for NRC review but the plant does not require this amendment to allow continued safe full power operation.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Pennsylvania State Official.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 23, 2001.

If you should have any questions regarding this submittal, please contact Mr. Thomas S. Cosgrove, Manager, Regulatory Affairs at 724-682-5203.

Sincerely,



Lew W. Myers

Attachments: A - Proposed Technical Specification Changes
 B - Description and Assessment
 C - List of Commitments

c: Mr. L. J. Burkhart, 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)

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bc: A. J. Dometrovich
K. A. McMullen
S. J. Sarver
B. F. Sepelak
F. P. Ferri
M. E. O'Reilly
Central File - *Keywords: LAR*

ATTACHMENT A

Beaver Valley Power Station, Unit Nos. 1 and 2
License Amendment Request Nos. 294 and 166
Proposed Technical Specification Changes

The following is a list of the affected pages.

6-6 (Unit 1)

6-7 (Unit 2)

SAFETY LIMIT VIOLATION (Continued)

- d. The Safety Limit Violation Report shall be submitted to the Commission, the ORC and the plant manager within 30 days of the violation.

6.8 PROCEDURES

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Not used.
- e. Not used.
- f. Fire Protection Program implementation.
- g. PROCESS CONTROL PROGRAM implementation.
- h. OFFSITE DOSE CALCULATION MANUAL implementation.

6.8.2 Deleted

6.8.3 Deleted

Deleted *e*

6.8.4 A Post-Accident monitoring program shall be established, implemented, and maintained:

A program which will provide the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples following an accident. The program shall include the following:

- (i) Training of personnel,
- (ii) Procedures for sampling and analysis, and
- (iii) Provisions for maintenance of sampling and analysis equipment.

(PROPOSED WORDING)

SAFETY LIMIT VIOLATION (Continued)

- d. The Safety Limit Violation Report shall be submitted to the Commission, the ORC and the plant manager within 30 days of the violation.

6.8 PROCEDURES

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Not used.
- e. Not used.
- f. Fire Protection Program implementation.
- g. PROCESS CONTROL PROGRAM implementation.
- h. OFFSITE DOSE CALCULATION MANUAL implementation.

6.8.2 Deleted

6.8.3 Deleted

Deleted *g*

6.8.4 A Post-Accident monitoring program shall be established, implemented, and maintained. The program will provide the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples following an accident. The program shall include the following:

- (i) Training of personnel,
- (ii) Procedures for sampling and analysis, and
- (iii) Provisions for maintenance of sampling and analysis equipment.

(PROPOSED WORDING)

ATTACHMENT B

Beaver Valley Power Station, Unit Nos. 1 and 2 License Amendment Request Nos. 294 and 166 Description and Assessment

A. DESCRIPTION OF AMENDMENT REQUEST

This proposed License Amendment Request (LAR) is a request pursuant to 10 CFR 50.90 to delete Technical Specification (TS) 6.8.4, Post Accident Monitoring Program.

The proposed License amendment would delete the program requirements TS 6.8.4, Post Accident Monitoring Program, and thereby eliminate the requirements to have and maintain the Post Accident Sampling System (PASS) at Beaver Valley Power Station (BVPS) Unit No. 1 and No. 2.

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366 "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this Technical Specification improvement was announced in Federal Register, Vol. 65, No. 211 "Notice of Availability for Referencing in License Amendment Applications - Model Safety Evaluation on Technical Specification Improvement to Eliminate Requirements on Post Accident Sampling Systems Using the Consolidated Line Item Improvement Process," on October 31, 2000, as part of the Consolidated Line Item Improvement Process (CLIIP).

B. BACKGROUND

Westinghouse Owners Group (WOG) topical report WCAP-14986-A, Rev. 2, "Post Accident Sampling System Requirements: A Technical Basis," (dated July 2000) evaluated the PASS requirements to determine their contribution to plant safety and accident recovery. The topical report considered the progression and consequences of core damage accidents and assessed the accident progression with respect to plant abnormal and emergency operating procedures, severe accident management guidance, and emergency plans. WCAP-14986-A, Rev. 2, concluded that the current PASS samples specified in NUREG-0737, "Clarification of TMI Action Plan Requirements," may be eliminated.

C. APPLICABILITY OF PUBLISHED SAFETY EVALUATION

FENOC has reviewed the safety evaluation published as part of the CLIIP. This verification included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-366 (i.e., WCAP-14986-A, Rev. 2, "Post Accident Sampling System Requirements: A Technical Basis," submitted October 26, 1998, as supplemented by letters dated April 28, 1999, April 10, 2000, and May 22, 2000). FENOC has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to BVPS Unit No. 1 and No. 2 and justify this amendment for the incorporation of the changes to the BVPS Unit No. 1 and No. 2 Technical Specifications.

FENOC is not proposing any variations or deviations from the technical specification changes described in TSTF-366 or the NRC staff's model safety evaluation published on October 31, 2000.

D. VERIFICATION AND COMMITMENTS

As discussed in the notice of availability published in Federal Register (Vol. 65, No. 211) for this Technical Specification improvement, plant-specific verifications were performed as follows:

1. FENOC will develop contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. A description of the contingency plans will be contained in the emergency preparedness plan or emergency preparedness plan implementing procedures, and implemented in accordance with the License amendment. Establishment of contingency plans is considered a regulatory commitment.
2. The capability for classifying fuel damage events at the Alert level threshold has been established at 2-5% fuel clad damage. The level of core damage is associated with radioactivity levels of 300 $\mu\text{Ci/gm}$ dose equivalent iodine. This capability will be described in the Emergency Plan, and implemented in accordance with the License amendment. The capability for classifying fuel damage events is considered a regulatory commitment.
3. FENOC has established the capability to monitor radioactive iodines that have been released offsite to the environs. This capability is described in

our emergency preparedness plan implementing procedures. The capability to monitor radioactive iodines is considered a regulatory commitment.

E. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

FENOC has reviewed the proposed no significant hazards consideration determination published as part of the CLIIP. FENOC has concluded that the proposed determination presented in the notice is applicable to BVPS Unit No. 1 and No. 2 and the determination is hereby incorporated, by reference to satisfy the requirements of 10 CFR 50.91(a).

F. ENVIRONMENTAL CONSIDERATION

FENOC has reviewed the environmental evaluation included in the model safety evaluation published on October 31, 2000 as part of the CLIIP. FENOC has determined that the staff's findings presented in that evaluation are applicable to BVPS Unit No. 1 and No. 2 and the evaluation is hereby incorporated by reference for this application.

ATTACHMENT C

Beaver Valley Power Station, Unit Nos. 1 and 2 License Amendment Request Nos. 294 and 166 List of Commitments

The following table identifies those actions committed to by FENOC in this document. Any other statements in this submittal are provided for information purposes and are not considered to be commitments. Please direct questions regarding these commitments to Mr. Thomas S. Cosgrove, Manager, Regulatory Affairs at 724-682-5203.

COMMITMENT	Due Date/Event
FENOC will develop contingency plans for obtaining and analyzing highly radioactive samples of the reactor coolant, containment sump, and containment atmosphere. A description of the contingency plans will be contained in the emergency preparedness plan or emergency preparedness plan implementing procedures, and implemented within the implementation period of the License amendment. Establishment of contingency plans is considered a regulatory commitment.	180 days from date of issuance
The capability for classifying fuel damage events at the Alert level threshold has been established at 2-5% fuel clad damage. The level of core damage is associated with radioactivity levels of 300 $\mu\text{Ci/gm}$ dose equivalent iodine. This capability will be described in the Emergency Plan, and implemented with the implementation of the License amendment. The capability for classifying fuel damage events is considered a regulatory commitment.	180 days from date of issuance
FENOC has established the capability to monitor radioactive iodines that have been released offsite to the environs. This capability is described in our emergency preparedness plan implementing procedures. The capability to monitor radioactive iodines is considered a regulatory commitment.	Complete