FENOC
FirstEnergy Nuclear Operating Company

Beaver Valley Power Station
Route 168
PO Box 4
Shippingport, PA 15077-0004

Mark B. Bezilla
Site Vice President

724-682-5234
Fax: 724-643-8069

March 26, 2003
L-03-049

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
License Amendment Request Nos. 313 and 186

Pursuant to 10 CFR 50.90, FirstEnergy Nuclear Operating Company (FENOC) hereby requests an amendment to the above licenses for Beaver Valley Power Station (BVPS) Unit Nos. 1 and 2 in the form of changes to the Technical Specifications. The proposed amendments will modify the Technical Specification requirements for missed surveillances in Specification 4.0.3. The changes are consistent with the Nuclear Regulatory Commission approved Technical Specification Task Force (TSTF), Standard Technical Specification Change TSTF-358, Revision 6. The availability of this Technical Specification improvement was published in the Federal Register on September 28, 2001, (Federal Register Notice 66 FR 49714) as part of the Consolidated Line Item Improvement Process (CLIIP). In addition, the proposed amendments will modify Specifications 4.0.1 and 4.0.3 to be consistent with the Improved Standard Technical Specifications. This proposed change is necessary to accommodate the changes addressed by the CLIIP.

The FENOC evaluation of the proposed changes are presented in the Enclosure. The proposed Technical Specification changes are presented in Attachments A-1 and A-2 for BVPS Unit Nos. 1 and 2, respectively. The proposed Technical Specification Bases changes are presented in Attachments B-1 and B-2 for BVPS Unit Nos. 1 and 2, respectively, for information only. New regulatory commitments associated with this request are provided in Attachment C.

The Beaver Valley review committees have reviewed the changes. The changes were determined to be safe and do not involve a significant hazard consideration as defined in 10 CFR 50.92 based on the attached safety evaluation and no significant hazard evaluation.

A001

FENOC requests approval of the proposed amendments by December 2003. Once approved, the amendments shall be implemented within 60 days.

If there are any questions concerning this matter, please contact Mr. Larry R. Freeland, Manager, Regulatory Affairs/Performance Improvement at 724-682-5284.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 26, 2003.

Sincerely,

Mark B. Bezilla

Enclosure:
FENOC Evaluation of the Proposed Changes

Attachments:
A-1 Proposed BVPS Unit 1 Technical Specification Changes
A-2 Proposed BVPS Unit 2 Technical Specification Changes
B-1 Proposed BVPS Unit 1 Technical Specification Bases Changes
B-2 Proposed BVPS Unit 2 Technical Specification Bases Changes
C. Commitment Summary

c: Mr. T. G. Colburn, NRR Senior Project Manager
Mr. D. M. Kern, NRC Sr. Resident Inspector
Mr. H. J. Miller, NRC Region I Administrator
Mr. D. A. Allard, Director BRP/DEP
Mr. L. E. Ryan (BRP/DEP)

ENCLOSURE
FENOC Evaluation of the Proposed Changes

Beaver Valley Power Station
License Amendment Requests
313 (Unit 1) And 186 (Unit 2)

Subject: Application for Technical Specification Change Regarding Missed Surveillances Using the Consolidated Line Item Improvement Process

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Attachments

Number	Title
A-1	Proposed Unit 1 Technical Specification Changes
A-2	Proposed Unit 2 Technical Specification Changes
B-1	Proposed Unit 1 Technical Specification Bases Changes
B-2	Proposed Unit 2 Technical Specification Bases Changes
C	Commitment Summary

1.0 DESCRIPTION

The proposed amendments would revise the Beaver Valley Power Station (BVPS) Unit No. 1 and Unit No. 2 Technical Specifications 4.0.1 and 4.0.3 to be consistent with the format of the Improved Standard Technical Specifications and revise the requirements for missed surveillances in Specification 4.0.3 consistent with the Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specifications Change TSTF-358, Revision 6. The proposed changes are being submitted in conjunction with the Consolidated Line Item Improvement Process (CLIIP).

2.0 PROPOSED CHANGES

The proposed amendments would make the following two specific changes to accommodate the changes addressed by the CLIIP:

- Convert Specification 4.0.1 and 4.0.3 from the current BVPS Technical Specifications format to the Improved Standard Technical Specification (ISTS) format (i.e., NUREG-1431, Rev. 2)

- Incorporate the changes proposed by TSTF-358, Revision 6 (CLIIP)

The proposed Technical Specification changes are provided in Attachments A-1 and A-2 for Units 1 and 2, respectively. The changes proposed to the Technical Specification Bases are provided in Attachments B-1 and B-2 for Units 1 and 2, respectively. The changes to the Technical Specification Bases are provided for information only and will be revised in accordance with the BVPS Technical Specification Bases Control Program. Attachment C provides a list of commitments associated with this License Amendment Request (LAR).

The proposed changes to the Technical Specifications and Technical Specification Bases have been prepared electronically. Deletions are shown with a strike-through and insertions are shown double-underlined. Changes associated with TSTF-358, Revision 6 (CLIIP) are shown in bold italicized format. To meet format requirements the Technical Specifications and Bases pages will be revised and repaginated as necessary to reflect the changes being proposed by this LAR.

3.0 ASSESSMENT

3.1 Optional Changes and Variations

Due to the vintage of the BVPS Technical Specifications, incorporation of the changes in the CLIIP will require two areas of change. First, FENOC proposes to modify the wording of the current Specifications 4.0.1 and 4.0.3 and applicable Bases to be consistent with NUREG-1431, Revision 2. These changes are necessary in order to make the current Technical Specifications compatible with the proposed changes of TSTF-358. Second, Specification 4.0.3 and associated Bases will be modified in accordance with the CLIIP. FENOC is not proposing any variations or deviations from the Technical Specification changes described in TSTF-358, Revision 6, except as required to incorporate terminology consistent with the current BVPS Technical Specifications.

3.2 Safety Evaluation

Conversion to Improved Technical Specification Format

Specification 4.0.1 and 4.0.3 and associated Bases are being modified to be consistent with NUREG-1431, Revision 2. These changes are necessary to make the current BVPS Technical Specifications compatible with the proposed changes of TSTF-358, Revision 6 and results in only minor differences in the requirements. Upon a discovery of a missed surveillance, the current Specification 4.0.3 requires declaration of the associated Limiting Condition for Operation (LCO) as not being met while allowing implementation of the Action Statement requirements of the LCO to be delayed. Modifying the wording to be consistent with the NUREG allows the declaration of the LCO not being met to be delayed. Effectively, both wordings provide the same flexibility, i.e., the allowance to delay implementing actions required by a LCO when a surveillance has not been performed. The proposed modifications do not involve any technical changes to the existing Technical Specifications and, as such, are administrative in nature and have no impact on plant safety.

The proposed changes contain only minor variations or deviations from the wording of NUREG-1431, Revision 2 in order to ensure consistency with the current BVPS Technical Specification wording. The variations are listed below:

- The acronym "SR" used in the ISTS is replaced with "Surveillance" or "Surveillance Requirement" as appropriate in the BVPS Technical Specifications and Bases. This is an administrative change only.

- The term "Frequency" used in the ISTS is changed to "surveillance interval" to be consistent with the BVPS Technical Specifications and Bases. This is an administrative change only and does not change the meaning or intent of the Specification.

- Reference to SR 3.0.2 and SR 3.0.3 in the ISTS is changed to the BVPS equivalent of 4.0.2 and 4.0.3. This is an administrative change only.

- The acronym "LCO" in the ISTS is replaced with "Limiting Condition for Operation" to be consistent with the BVPS Technical Specifications and Bases. This is an administrative change only.

- The phrase "Required Actions" and "Condition(s)" in the ISTS is replaced with the phrase "Action requirements" or "Action statement" to be consistent with the BVPS Technical Specifications. This is an administrative change only.

- The phrase "specified frequency" is replaced with the phrase "allowed surveillance interval, defined by Specification 4.0.2" in Specification 4.0.1 and the first sentence in Specification 4.0.3. This change is made to clearly define that the surveillance interval includes allowances for surveillance interval extensions as provided in Specification 4.0.2 and is consistent with the current wording of Specification 4.0.3.

- Specification 4.0.1 Bases discussion regarding post maintenance testing is revised to be more specific to BVPS. Specifically, the Auxiliary Feedwater System turbine driven pump is revised to include the BVPS-specific steam pressure (consistent with BVPS Unit 1 and Unit 2 Specification 3.7.1.2) and the second example is deleted because the BVPS Technical Specifications do not contain requirements that directly relate to those described in the example. This is an administrative change only and does not change the intent of the respective Bases.

Incorporation of TSTF-358, Revision 6

FENOC has reviewed the NRC model safety evaluation dated June 14, 2001, as modified in response to the comments noticed in the Federal Register on September 28, 2001, as part of the CLIIP. This review included a review of the NRC staff's evaluation, as well as the supporting information provided to support TSTF-358. FENOC has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to the Beaver Valley Units No. 1 and No. 2 and justify these amendments for the incorporation of the changes to the Beaver Valley Unit 1 and Unit 2 Technical Specifications.

4.0 REGULATORY ANALYSIS

4.1 No Significant Hazards Consideration

Conversion to Improved Technical Specification Format

FirstEnergy Nuclear Operating Company (FENOC) has evaluated whether or not a significant hazards consideration is involved with the proposed amendments by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

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

Response: No.

The proposed changes involve rewording of the existing Technical Specifications to be consistent with NUREG-1431, Revision 2. These modifications involve no technical changes to the existing Technical Specifications. As such, these changes are administrative in nature and do not affect initiators of analyzed events or assumed mitigation of accident or transient events. Therefore, the proposed changes will not increase the probability or consequences of an accident previously evaluated.

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

Response: No.

The proposed changes involve rewording of the existing Technical Specifications to be consistent with NUREG-1431, Revision 2. The change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in methods governing normal plant operation. The changes will not impose any new or different requirements or eliminate any existing requirements. Therefore, the proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No.

The proposed changes involve rewording of the existing Technical Specifications to be consistent with NUREG-1431, Revision 2. The changes are administrative in nature and will not involve any technical changes. The changes will not reduce a margin of safety because they have no impact on any safety analysis assumptions. Also, since these changes are administrative in nature, no question of safety is involved. Therefore, there will be no reduction in a margin of safety.

Incorporation of TSTF-358, Revision 6

FENOC has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the Federal Register (66 FR 32400) as part of the CLIIP. FENOC has concluded that the proposed NSHCD presented in the Federal Register notice is applicable to Beaver Valley Power Station Units No. 1 and No. 2 and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

Based on the above, FENOC concludes that the proposed amendments present no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.2 Verification and Commitments

As discussed in the notice of availability published in the Federal Register on September 28, 2001, for this Technical Specification improvement, plant-specific verifications were performed as follows:

FENOC will implement changes to the Technical Specification Bases for Specification 4.0.3, which state that the use of delay period established for Specification 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals, but only for the performance of a missed surveillance.

The modification will also include changes to the Bases for Specification 4.0.3 that provide details on how to implement the new requirements. The Bases changes provide guidance for surveillance frequencies that are not based on time intervals, but are based on specified unit conditions, operating situations, or requirements of regulations. In addition, the Bases changes state that FENOC is expected to perform a missed surveillance test at the first reasonable opportunity, taking into account appropriate considerations, such as the impact on plant risk and accident analysis assumptions, consideration of unit conditions, planning, availability of personnel, and time required to perform the surveillance. The Bases also state that the risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risks Before Maintenance Activities at Nuclear Power Plants," and that the missed surveillance should be treated as an emergent condition, as discussed in Regulatory Guide 1.182. In addition, the Bases state that the degree of depth and rigor of the evaluation should be commensurate with the importance of the component and that a missed surveillance for an important component should be analyzed quantitatively. The Bases also state that the results of the risk evaluation determine the safest course of action. In addition, the Bases state that all missed surveillance tests will be placed in FENOC's Corrective Action Program. Finally, FENOC has a Bases Control Program consistent with Section 5.5 of the Standard Technical Specifications.

5.0 ENVIRONMENTAL EVALUATION

Conversion to Improved Technical Specification Format

FENOC has evaluated the proposed changes to revise Specifications 4.0.1 and 4.0.3 to be consistent with NUREG-1431, Revision 2 against the criteria for identification of licensing and regulatory actions requiring environmental assessments in accordance with 10 CFR 51.22. The proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

Incorporation of TSTF-358, Revision 6

FENOC has reviewed the environmental evaluation included in the model safety evaluation dated June 14, 2001, as part of the CLIIP. FENOC has concluded that the staff's findings presented in that evaluation are applicable to Beaver Valley Unit 1 and Unit 2 and the evaluation is hereby incorporated by reference for this application.

Attachment A-1

Beaver Valley Power Station, Unit No. 1
Proposed Technical Specification Changes

License Amendment Request No. 313

The following is a list of the affected pages:

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LIMITING CONDITION FOR OPERATION (continued)

source is OPERABLE; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are OPERABLE, or likewise satisfy the requirements of this specification. Unless both conditions (1) and (2) are satisfied within 2 hours, action shall be initiated to place the unit in a MODE in which the applicable Limiting Condition for Operation does not apply, by placing it, as applicable, in:

1. At least HOT STANDBY within the next 6 hours,
2. At least HOT SHUTDOWN within the following 6 hours, and
3. At least COLD SHUTDOWN within the subsequent 24 hours.

This specification is not applicable in MODES 5 or 6.

3.0.6 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to Limiting Condition for Operation 3.0.1 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the Limiting Condition for Operation. Failure to perform a Surveillance within the allowed surveillance interval, defined by Specification 4.0.2, shall be failure to meet the Limiting Condition for Operation except as provided in Specification 4.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the surveillance interval.

4.0.3 ~~Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours. Surveillance~~

~~Requirements do not have to be performed on inoperable equipment.~~ If it is discovered that a Surveillance was not performed within its allowed surveillance interval, defined by Specification 4.0.2, then compliance with the requirement to declare the Limiting Condition for Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified surveillance interval, whichever is ~~***less***~~***greater***. This delay period is permitted to allow performance of the Surveillance. ***A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.***

If the Surveillance is not performed within the delay period, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION(s) must be entered.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated

Attachment A-2

Beaver Valley Power Station, Unit No. 2
Proposed Technical Specification Changes

License Amendment Request No. 186

The following is a list of the affected pages:

3/4 0-2

source is OPERABLE; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are OPERABLE, or likewise satisfy the requirements of this specification. Unless both conditions (1) and (2) are satisfied within 2 hours, action shall be initiated to place the unit in a MODE in which the applicable Limiting Condition for Operation does not apply, by placing it, as applicable, in:

1. At least HOT STANDBY within the next 6 hours,
2. At least HOT SHUTDOWN within the following 6 hours, and
3. At least COLD SHUTDOWN within the subsequent 24 hours.

This specification is not applicable in MODES 5 or 6.

3.0.6 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to Limiting Condition for Operation 3.0.1 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement. Failure to meet a surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the Limiting Condition for Operation. Failure to perform a surveillance within the allowed surveillance interval, defined by Specification 4.0.2, shall be failure to meet the Limiting Condition for Operation except as provided in Specification 4.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the surveillance interval.

4.0.3 ~~Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits~~

~~of the ACTION requirements are less than 24 hours. Surveillance Requirements do not have to be performed on inoperable equipment.~~ If it is discovered that a Surveillance was not performed within its allowed surveillance interval, defined by Specification 4.0.2, then compliance with the requirement to declare the Limiting Condition for Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified surveillance interval, whichever is ~~***less***~~***greater***. This delay period is permitted to allow performance of the Surveillance. ***A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.***

If the Surveillance is not performed within the delay period, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION(s) must be entered.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated

Attachment B-1

Beaver Valley Power Station, Unit No. 1
Proposed Technical Specification Bases Changes

License Amendment Request No. 313

The following is a list of the affected pages:

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An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of a surveillance requirement on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of a surveillance requirement on another channel in the same trip system.

Specification 4.0.1 through 4.0.5 establish the general requirements applicable to Surveillance Requirements. These requirements are based on the Surveillance Requirements stated in the Code of Federal Regulations, 10 CFR 50.36(c)(3):

> "Surveillance requirements are requirements relating to test, calibration, or inspection to ensure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions of operation will be met."

Specification 4.0.1 establishes the requirement that surveillances must be ~~performed~~ met during the OPERATIONAL MODES or other conditions for which the requirements of the Limiting Conditions for Operation apply unless otherwise stated in an individual Surveillance Requirement. The purpose of this specification is to ensure that surveillances are performed to verify the ~~operational status~~OPERABILITY of systems and components and that parameters are within specified limits to ensure safe operation of the facility when the plant is in a MODE or other specified condition for which the associated Limiting Conditions for Operation are applicable. Failure to meet a Surveillance within the allowed surveillance interval, in accordance with Specification 4.0.2, constitutes a failure to meet a Limiting Condition for Operation.

Systems and components are assumed to be OPERABLE when the associated Surveillance Requirements have been met. Nothing in this Specification, however, is to be construed as implying that systems or components are OPERABLE when:

a. The systems or components are known to be inoperable, although still meeting the Surveillance Requirements; or

b. The requirements of the Surveillance(s) are known not to be met between required Surveillance performances.

Surveillance Requirements do not have to be performed when the facility is in an OPERATIONAL MODE or other specified condition for which the requirements of the associated Limiting Condition for Operation do not apply unless otherwise specified. The Surveillance

Requirements associated with a Special Test Exception are only applicable when the Special Test Exception is used as an allowable exception to the requirements of a Specification.

Unplanned events may satisfy the requirements (including applicable acceptance criteria) for a given Surveillance Requirement. In this case, the unplanned event may be credited as fulfilling the performance of the Surveillance Requirement. This allowance includes those Surveillance Requirements whose performance is normally precluded in a given MODE or other specified condition.

Surveillance Requirements, including Surveillances invoked by ACTION requirements, do not have to be performed on inoperable equipment because the ACTIONS define the remedial measures that apply. Surveillances have to be met and performed in accordance with Specification 4.0.2, prior to returning equipment to OPERABLE status.

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with Specification 4.0.2. Post maintenance testing may not be possible in the current MODE or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to a MODE or other specified condition where other necessary post maintenance tests can be completed.

An example of this process is Auxiliary feedwater(AFW) pump turbine maintenance during refueling that requires testing at steam pressures > 600 psig. If other appropriate testing is satisfactorily completed, the AFW System can be considered OPERABLE. This allows startup and other necessary testing to proceed until the plant reaches the steam pressure required to perform the testing.

Specification 4.0.2 establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18-month

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surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

~~Specification 4.0.3 establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Under provisions of this specification, systems and components are assumed to be OPERABLE when Surveillance Requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are OPERABLE when they are found or known to be inoperable although still meeting the Surveillance Requirements. This specification also clarifies that the ACTION requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the ACTION requirements apply from the point in time it is identified that a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded. Completion of the Surveillance Requirement within the allowable outage time limits of the ACTION requirements restores compliance with the requirements of Specification 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was a violation of the OPERABILITY requirements of a Limiting Condition for Operation that is subject to enforcement action. Further, the failure to perform a surveillance within the provisions of Specification 4.0.2 is a violation of a Technical Specification requirement and is, therefore, a reportable event under the requirements of 10 CFR 50.73(a)(2)(i)(B) because it is a condition prohibited by the plant's Technical Specifications.~~

~~If the allowable outage time limits of the ACTION requirements are less than 24 hours or a shutdown is required to comply with ACTION requirements, e.g., Specification 3.0.3, a 24 hour allowance is provided to permit a delay in implementing the ACTION requirements. This provides an adequate time limit to complete Surveillance Requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown is required to comply with ACTION requirements or before~~

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~~other remedial measures would be required that may preclude completion of a surveillance. The basis for this allowance includes consideration for plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and the safety significance of the delay in completing the required surveillance. This provision also provides a time limit for the completion of Surveillance Requirements that become applicable as a consequence of MODE changes imposed by ACTION requirements and for completing Surveillance Requirements that are applicable when an exception to the requirements of Specification 4.0.4 is allowed. If a surveillance is not completed within the 24 hour allowance, the time limits of the ACTION requirements are applicable at that time. When a surveillance is performed within the 24 hour allowance and the Surveillance Requirements are not met, the time limits of the ACTION requirements are applicable at the time that the surveillance is terminated.~~

~~Surveillance Requirements do not have to be performed on inoperable equipment because the ACTION requirements define the remedial measures that apply. However, the Surveillance Requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status.~~

Specification 4.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the allowed surveillance interval. A delay period of up to 24 hours or up to the limit of the specified surveillance interval, whichever is ~~***lessgreater***~~, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with Specification 4.0.2 (which allows a maximum surveillance interval extension of 25% of the specified time interval), and not at the time that the allowed surveillance interval was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with ACTION requirements or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements. ~~***When a Surveillance with a surveillance interval based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, Specification 4.0.3 allows the full delay period of 24 hours to perform the Surveillance.***~~

~~*Specification 4.0.3 also provides a time limit for completion of Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.*~~

When a Surveillance with a surveillance interval based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, Specification 4.0.3 allows for the full delay period of up to the specified surveillance interval to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

Specification 4.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of MODE changes imposed by ACTION requirements.

Failure to comply with allowed surveillance intervals for the Surveillance requirements is expected to be an infrequent occurrence. Use of the delay period established by Specification 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals. *While up to 24 hours or the limit of the specified surveillance interval is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the Corrective Action Program.*

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the allowed outage times of the ACTION requirements for the applicable Limiting Condition for Operation begins immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and

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the allowed outage times of the ACTION requirements for the applicable Limiting Condition for Operation begins immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Allowed Outage Time of the applicable ACTIONS, restores compliance with Specification 4.0.1.

Specification 4.0.4 establishes the requirement that all applicable surveillances must be met before entry into an OPERATIONAL MODE or other condition of operation specified in the Applicability statement. The purpose of this specification is to ensure that system and component OPERABILITY requirements or parameter limits are met before entry into a MODE or condition for which these systems and components ensure safe operation of the facility. This provision applies to changes in OPERATIONAL MODES or other specified conditions associated with plant shutdown as well as startup.

Under the provisions of this specification, the applicable Surveillance Requirements must be performed within the specified surveillance interval to ensure that the Limiting Conditions for Operation are met during initial plant startup or following a plant outage.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 4.0.4 do not apply because this would delay placing the facility in a lower MODE of operation.

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Attachment B-2

Beaver Valley Power Station, Unit No. 2
Proposed Technical Specification Bases Changes

License Amendment Request No. 186

The following is a list of the affected pages:

B 3/4 0-6
B 3/4 0-7
B 3/4 0-8

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of a surveillance requirement on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of a surveillance requirement on another channel in the same trip system.

Specifications 4.0.1 through 4.0.5 establish the general requirements applicable to Surveillance Requirements. These requirements are based on the Surveillance Requirements stated in the Code of Federal Regulations, 10 CFR 50.36(c)(3):

> "Surveillance requirements are requirements relating to test, calibration, or inspection to ensure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions of operation will be met."

Specifications 4.0.1 establishes the requirement that surveillances must be ~~performed~~met during the OPERATIONAL MODES or other conditions for which the requirements of the Limiting Conditions for Operation apply unless otherwise stated in an individual Surveillance Requirement. The purpose of this specification is to ensure that surveillances are performed to verify the ~~operational status~~OPERABILITY of systems and components and that parameters are within specified limits to ensure safe operation of the facility when the plant is in a MODE or other specified condition for which the associated Limiting Conditions for Operation are applicable. Failure to meet a Surveillance within the allowed surveillance interval, in accordance with Specification 4.0.2, constitutes a failure to meet a Limiting Condition for Operation.

Systems and components are assumed to be OPERABLE when the associated Surveillance Requirements have been met. Nothing in this Specification, however, is to be construed as implying that systems or components are OPERABLE when:

a. The systems or components are known to be inoperable, although still meeting the Surveillance Requirements; or

b. The requirements of the Surveillance(s) are known not to be met between required Surveillance performances.

Surveillance Requirements do not have to be performed when the facility is in an OPERATIONAL MODE or other specified condition for which the requirements of the associated Limiting Condition for Operation do not apply unless otherwise specified. The Surveillance

Requirements associated with a Special Test Exception are only applicable when the Special Test Exception is used as an allowable exception to the requirements of a specification.

Unplanned events may satisfy the requirements (including applicable acceptance criteria) for a given Surveillance Requirement. In this case, the unplanned event may be credited as fulfilling the performance of the Surveillance Requirement. This allowance includes those Surveillance Requirements whose performance is normally precluded in a given MODE or other specified condition.

Surveillance Requirements, including Surveillances invoked by ACTION requirements, do not have to be performed on inoperable equipment because the ACTIONS define the remedial measures that apply. Surveillances have to be met and performed in accordance with Specification 4.0.2, prior to returning equipment to OPERABLE status.

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with Specification 4.0.2. Post maintenance testing may not be possible in the current MODE or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to a MODE or other specified condition where other necessary post maintenance tests can be completed.

An example of this process is Auxiliary feedwater(AFW) pump turbine maintenance during refueling that requires testing at steam pressures > 600 psig. If other appropriate testing is satisfactorily completed, the AFW System can be considered OPERABLE. This allows startup and other necessary testing to proceed until the plant reaches the steam pressure required to perform the testing.

Specification 4.0.2 establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18-month

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surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

~~Specification 4.0.3 establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Under the provisions of this specification, systems and components are assumed to be OPERABLE when Surveillance Requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are OPERABLE when they are found or known to be inoperable although still meeting the Surveillance Requirements. This specification also clarifies that the ACTION requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the ACTION requirements apply from the point in time it is identified that a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded. Completion of the Surveillance Requirement within the allowable outage time limits of the ACTION requirements restores compliance with the requirements of Specification 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was a violation of the OPERABILITY requirements of a Limiting Condition for Operation that is subject to enforcement action. Further, the failure to perform a surveillance within the provisions of Specification 4.0.2 is a violation of a Technical Specification requirement and is, therefore, a reportable event under the requirements of 10 CFR 50.73(a)(2)(i)(B) because it is a condition prohibited by the plant's Technical Specifications.~~

~~If the allowable outage time limits of the ACTION requirements are less than 24 hours or a shutdown is required to comply with ACTION requirements, e.g., Specification 3.0.3, a 24 hour allowance is provided to permit a delay in implementing the ACTION requirements. This provides an adequate time limit to complete Surveillance Requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown is required to comply with ACTION requirements or before~~

~~other remedial measures would be required that may preclude completion of a surveillance. The basis for this allowance includes consideration for plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and the safety significance of the delay in completing the required surveillance. This provision also provides a time limit for the completion of Surveillance Requirements that become applicable as a consequence of MODE changes imposed by ACTION requirements and for completing Surveillance Requirements that are applicable when an exception to the requirements of Specification 4.0.4 is allowed. If a surveillance is not completed within the 24 hour allowance, the time limits of the ACTION requirements are applicable at that time. When a surveillance is performed within the 24 hour allowance and the Surveillance Requirements are not met, the time limits of the ACTION requirements are applicable at the time that the surveillance is terminated.~~

~~Surveillance Requirements do not have to be performed on inoperable equipment because the ACTION requirements define the remedial measures that apply. However, the Surveillance Requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status.~~

Specification 4.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the allowed surveillance interval. A delay period of up to 24 hours or up to the limit of the specified surveillance interval, whichever is ~~***less***~~***greater***, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with Specification 4.0.2 (which allows a maximum surveillance interval extension of 25% of the specified time interval), and not at the time that the allowed surveillance interval was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with ACTION requirements or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements. ~~***When a Surveillance with a surveillance interval based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, Specification 4.0.3 allows the full delay period of 24 hours to perform the Surveillance.***~~

~~*Specification 4.0.3 also provides a time limit for completion of Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.*~~

When a Surveillance with a surveillance interval based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, Specification 4.0.3 allows for the full delay period of up to the specified surveillance interval to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

Specification 4.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of MODE changes imposed by ACTION requirements.

Failure to comply with allowed surveillance intervals for the Surveillance requirements is expected to be an infrequent occurrence. Use of the delay period established by Specification 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals. *While up to 24 hours or the limit of the specified surveillance interval is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the Corrective Action Program.*

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the allowed outage times of the ACTION requirements for the applicable Limiting Condition for Operation begins immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment

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is inoperable, or the variable is outside the specified limits and the allowed outages times of the ACTION requirements for the applicable Limiting Condition for Operation begins immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Allowed Outage Time of the applicable ACTIONS, restores compliance with Specification 4.0.1.

Specification 4.0.4 establishes the requirement that all applicable surveillances must be met before entry into an OPERATIONAL MODE or other condition of operation specified in the Applicability statement. The purpose of this specification is to ensure that system and component OPERABILITY requirements or parameter limits are met before entry into a MODE or condition for which these systems and components ensure safe operation of the facility. This provision applies to changes in OPERATIONAL MODES or other specified conditions associated with plant shutdown as well as startup.

Under the provisions of this specification, the applicable Surveillance Requirements must be performed within the specified surveillance interval to ensure that the Limiting Conditions for Operation are met during initial plant startup or following a plant outage.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 4.0.4 do not apply because this would delay placing the facility in a lower MODE of operation.

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Attachment C

Beaver Valley Power Station, Unit Nos. 1 and 2

Commitment Summary

License Amendment Request Nos. 313 (Unit 1) and 186 (Unit 2)

Commitment List

The following table identifies those actions committed to by FirstEnergy Nuclear Operating Company (FENOC) for Beaver Valley Power Station (BVPS) Unit Nos. 1 and 2 in this document. Any other actions discussed in the submittal represent intended or planned actions by FENOC. They are described only as information and are not regulatory commitments. Please notify Mr. Larry R. Freeland, Manager, Regulatory Affairs/Performance Improvement, at Beaver Valley on (724) 682-5284 of any questions regarding this document or associated regulatory commitments.

COMMITMENT	DUE DATE
1. FENOC will establish the Technical Specification Bases for Specifications 4.0.1 and 4.0.3 as described in Attachments B-1 and B-2 of License Amendment Requests 313 (Unit 1) & 186 (Unit 2).	Amendment Implementation