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July 23, 2004
L-04-105

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

**Subject: Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66
Supplement to License Amendment Requests 321 and 326**

This letter provides a corrected marked-up Beaver Valley Power Station (BVPS) Unit 1 Technical Specification (TS) page that supercedes the mark-up that was submitted with License Amendment Request (LAR) Nos. 321 and 193. FENOC letter L-04-040, dated March 22, 2004, transmitted LAR Nos. 321 and 193 to the NRC. This LAR proposed revisions to the TS for BVPS Units 1 and 2 to incorporate the changes in Technical Specification Task Force change TSTF-359 related to mode change requirements. As part of this LAR, BVPS Unit 1 TS page 3/4 5-6 was marked-up to add a GENERAL NOTE to Technical Specification 3.5.3, ECCS SUBSYSTEMS – $T_{avg} < 350^{\circ}F$, that prohibits the use of LCO 3.0.4.b. However, location of the note was shown before the ACTION heading instead of after the ACTION heading on the Unit 1 TS mark-up. The note should be located after the ACTION heading in order to be consistent with TSTF-359 and Improved Standard Technical Specification formatting conventions. A corrected mark-up to BVPS Unit 1 TS page 3/4 5-6 is provided in Attachment 1. Note that the corresponding marked-up BVPS Unit 2 TS page 3/4 5-6 provided in the LAR showed the note in the correct location.

A mark-up to BVPS Unit 1 TS page 3/4 5-6 showing the changes proposed by LAR 321 and additional changes proposed by LAR 326 was included with FENOC letter L-04-074, dated June 1, 2004, which transmitted LAR Nos. 326 and 177 to the NRC. This LAR proposed revisions to the TS for BVPS Unit 1 and 2 to incorporate changes related to the Unit 2 Surveillance Capsule W Overpressure Protection System (OPPS) Analysis along with changes to Unit 1 to achieve consistency with the Unit 2 proposed changes. Since the mark-up to BVPS Unit 1 TS page 3/4 5-6 included with LAR 326 showed the changes proposed by LAR 321, it also showed the location of the note before the ACTION heading instead of after the ACTION heading. Attachment 2 provides a corrected mark-up to BVPS Unit 1 TS page 3/4 5-6 for LAR 326 which shows the note in the correct location following the ACTION heading.

The revision to BVPS Unit 1 TS page 3/4 5-6 is considered editorial and does not change the conclusions of the safety analyses and no significant hazard evaluations contained in L-04-040 or L-04-074.

No new commitments are contained in this submittal. 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 July 23, 2004.

Sincerely,



L. William Pearce

Attachments:

- 1 Revised mark-up to BVPS Unit 1 TS page 3/4 5-6 (License Amendment Request 321).
 - 2 Revised mark-up to BVPS Unit 1 TS page 3/4 5-6 (License Amendment Request 326).
- c: Mr. T. G. Colburn, NRR Senior Project Manager
Mr. P. C. Cataldo, 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)

Attachment 1

Revised mark-up to BVPS Unit 1 TS page 3/4 5-6

(License Amendment Request 321)

The following is the affected page.

3/4 5-6

EMERGENCY CORE COOLING SYSTEMS

3/4.5.3 ECCS SUBSYSTEMS - T_{avg} < 350°F

LIMITING CONDITION FOR OPERATION

3.5.3 As a minimum, one ECCS subsystem comprised of the following shall be OPERABLE:

- a. One OPERABLE centrifugal charging pump,#
- b. One OPERABLE Low Head Safety Injection Pump, and
- c. An OPERABLE flow path capable of taking suction from the refueling water storage tank upon being manually realigned and transferring suction to the containment sump during the recirculation phase of operation.

APPLICABILITY: MODE 4.

ACTION:

----- GENERAL NOTE -----
Specification 3.0.4.b is not applicable to ECCS centrifugal charging pumps.

- a. With no ECCS subsystem OPERABLE because of the inoperability of either the centrifugal charging pump or the flow path from the refueling water storage tank, restore at least one ECCS subsystem to OPERABLE status within 1 hour or be in COLD SHUTDOWN within the next 20 hours.
- b. In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be prepared and submitted in accordance with 10 CFR 50.4 within 30 days describing the circumstances of the actuation and the total accumulated actuation cycles to date.

SURVEILLANCE REQUIREMENTS

4.5.3.1 The ECCS subsystem shall be demonstrated OPERABLE per the applicable Surveillance Requirements of 4.5.2.

4.5.3.2 All charging pumps except the above required OPERABLE pumps, shall be demonstrated inoperable at least once per 12 hours whenever the temperature of one or more of the non-isolated RCS cold legs is ≤ the enable temperature specified in the PTLR by verifying that the control switches are placed in the PULL-TO-LOCK position and tagged.

A maximum of one centrifugal charging pump shall be OPERABLE whenever the temperature of one or more of the non-isolated RCS cold legs is ≤ the enable temperature specified in the PTLR.

Attachment 2

Revised mark-up to BVPS Unit 1 TS page 3/4 5-6

(License Amendment Request 326)

The following is the affected page.

3/4 5-6

3/4.5.3 ECCS SUBSYSTEMS - T_{avg} < 350°F

LIMITING CONDITION FOR OPERATION

3.5.3 As a minimum, one ECCS subsystem comprised of the following shall be OPERABLE:

- a. One OPERABLE centrifugal charging pump, #
- b. One OPERABLE Low Head Safety Injection Pump, and
- c. An OPERABLE flow path capable of taking suction from the refueling water storage tank upon being manually realigned and transferring suction to the containment sump during the recirculation phase of operation.

APPLICABILITY: MODE 4.

ACTION:

- - - - - GENERAL NOTE - - - - -

Specification 3.0.4.b is not applicable to ECCS centrifugal charging pumps.

- - - - -

- a. With no ECCS subsystem OPERABLE because of the inoperability of either the centrifugal charging pump or the flow path from the refueling water storage tank, restore at least one ECCS subsystem to OPERABLE status within 1 hour or be in COLD SHUTDOWN within the next 20 hours.
- b. In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be prepared and submitted in accordance with 10 CFR 50.4 within 30 days describing the circumstances of the actuation and the total accumulated actuation cycles to date.

SURVEILLANCE REQUIREMENTS

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~~# A maximum of one centrifugal charging pump shall be OPERABLE whenever the temperature of one or more of the non isolated RCS cold legs is ≤ the enable temperature specified in the PTLR.~~