

ATTACHMENT A

Beaver Valley Power Station, Unit No. 2  
Proposed Technical Specification Change No. 79

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The following is the affected Appendix B page:

Affected Page: 3

No routine monitoring programs are required to implement this condition.

4.2 Environmental Monitoring

4.2.1 Aquatic Monitoring

The certifications and permits required under the Clean Water Act provide mechanisms for protecting water quality and, indirectly, aquatic biota. The NRC will rely on the decisions made by the Commonwealth of Pennsylvania under the authority of the Clean Water Act for any requirements for aquatic monitoring.

4.2.2 Terrestrial Monitoring

~~Infrared~~ <sup>Deleted</sup> aerial photography every other year (Section 5.14.1 of FES).

4.2.3 Noise Monitoring

Noise monitoring program during first year of plant operation (Section 5.14.4 of FES).

5.0 Administrative Procedures

5.1 Review and Audit

The licensee shall provide for review and audit of compliance with the EPP. The audits shall be conducted independently of the individual or groups responsible for performing the specific activity. A description of the organization structure used to achieve the independent review and audit function and results of the audit activities shall be maintained and made available for inspection.

5.2 Records Retention

Records and logs relative to the environmental aspects of station operation shall be made and retained in a manner convenient for review and inspection. These records and logs shall be made available to NRC on request.

Records of modifications to station structures, systems and components determined to potentially affect the continued protection of the environment shall be retained for the life of the station. All other records, data and logs relating to this EPP shall be retained for five years or, where applicable, in accordance with the requirements of other agencies.

## ATTACHMENT B

### Beaver Valley Power Station, Unit No. 2 Proposed Technical Specification Change No. 79 DELETE TERRESTRIAL MONITORING

#### A. DESCRIPTION OF AMENDMENT REQUEST

The proposed amendment would delete the Appendix B Section 4.2.2 requirement to perform infrared aerial photography every other year (Section 5.14.1 of FES).

#### B. BACKGROUND

NUREG-1094 (September 1985), "Final Environmental Statement (FES) Related to the Operation of Beaver Valley Power Station, Unit 2," includes a requirement to perform infrared aerial photography every other year. It also states that the details of this program will be specified in the Environmental Protection Plan included as Appendix B to the Operating License.

#### C. JUSTIFICATION

The infrared aerial photography was specified as a means to monitor the environment for signs of injury as a result of salt drift from the cooling tower. Terrestrial monitoring by infrared aerial photography including extensive ground truthing was performed for the years 1986, 1988, 1990, and 1992. The results of the monitoring were reported in the Annual Environmental Report-Non-Radiological for those years. The monitoring reports for each of these studies concluded, "Based on interpretation of the color infrared photographs and field verification, there is no evidence to suggest that the cooling towers are causing vegetation stress."

#### D. SAFETY ANALYSIS

Appendix B to the Facility Operating License Section 4.2.2 provides a requirement to conduct infrared aerial photography every other year. This change proposes to delete that requirement based on the following:

1. The BV-2 Environmental Report - Operating License Stage was published prior to plant operation. Section 5.3.3 (Salt and Water Drift Impacts), states; "no appreciable impact resulting from operation of the natural draft cooling towers is anticipated for vegetation either on or off the BVPS site, including sensitive agricultural crops." This report also notes; "Ongoing monitoring to determine the effects of operation of the BV-1 cooling tower on vegetation has found

no evidence of stress." In addition, Section 6.2.4.3 (Ecological Parameters) states; " Infrared aerial photographs will be taken every other year. The photographs will be compared with preoperational photographs of the BVPS-2 area (Section 6.1.4.3). Any sign of stress due to salt drift or other sources could then be field checked."

2. The NRC Safety Evaluation for BV-1 Technical Specification Amendment No. 93 evaluated the Annual Environmental Non-Radiological Reports for the years 1976, 1978, 1983 and 1984 including the associated aerial photographs. The staff noted that in all cases, the cause of the observed stress is attributable to causes other than cooling tower drift. Therefore, an amendment was granted to delete the BV-1 requirement to perform the infrared aerial photography.
3. Terrestrial monitoring by infrared aerial photography including extensive ground truthing was performed for BV-2 in 1986, 1988, 1990, and 1992. The results of the monitoring was reported in the Annual Environmental Report - Non-Radiological and in each case concluded that the cooling towers are not causing vegetation stress.
4. Facility Operating License No. NPF-73, Appendix B, Section 1.0, Objectives of the Environmental Protection Plan, include the following two objectives to provide for protection of non-radiological environmental values during operation of the plant:
  - a) Verify that the facility is operated in an environmentally acceptable manner.
  - b) Keep NRC informed of environmental effects of facility operation and of actions taken to control those effects.

These objectives will be maintained since the reporting requirements provided in Section 4.1, Unusual or Important Environmental Events, remain unchanged.

The proposed change does not affect the safety of the plant or the operation of the cooling tower or the cooling tower environmental evaluations described in UFSAR Sections 2.3.2 and Appendix 2.3.A related to salt and water drift or the Section 15 accident analyses. Sufficient environmental monitoring has been performed to establish a reliable data history to provide adequate assurance that there is no detectable vegetation stress from operation of the BV-2 cooling tower. This is consistent with previous studies of the BV-1 cooling tower which also verified no detectable vegetation stress from operation of the

cooling tower. The BV-2 studies also demonstrate that the combined operation of both cooling towers produce no detectable vegetation stress. Therefore, eliminating the Appendix B requirement to perform infrared aerial photography is considered safe and will not reduce the safety of the plant.

E. NO SIGNIFICANT HAZARDS EVALUATION

The no significant hazard considerations involved with the proposed amendment have been evaluated, focusing on the three standards set forth in 10 CFR 50.92(c) as quoted below:

The Commission may make a final determination, pursuant to the procedures in paragraph 50.91, that a proposed amendment to an operating license for a facility licensed under paragraph 50.21(b) or paragraph 50.22 or for a testing facility involves no significant hazards consideration, if operation of the facility in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

The following evaluation is provided for the no significant hazards consideration standards.

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

The proposed change will delete from Facility Operating License No. NPF-73 the Appendix B Section 4.2.2 requirement to perform infrared aerial photography every other year. The acceptance limit which forms the licensing basis for this technical specification is related to environmental impact and has no impact on the margin of safety, accident analysis, or other design basis impacting the margin of safety. No increase in adverse environmental impact has been identified over that previously identified in the Final Environmental Statement - Operating License Stage, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board. The Final Environmental Statement concluded, based on a model of combined drift from Units 1 and 2, that no adverse impacts to sensitive species



of natural vegetation or to sensitive species of crops were expected. The staff also examined infrared aerial photographs taken from 1975 through 1983 and found no injury to vegetation from cooling tower drift in the vicinity of Unit 1.

Continued terrestrial monitoring was performed for Beaver Valley Unit 2 by infrared aerial photography in 1986, 1988, 1990, and 1992. The results as provided in the Annual Environmental Reports Non-Radiological concluded, "Based on interpretation of the infrared photographs and field verification, there is no evidence to suggest that the BVPS cooling towers are causing vegetation stress."

Based on the compilation of the infrared aerial photography performed for both BV-1 and BV-2, deletion of this terrestrial monitoring requirement will have no impact on the environment or the operation of the plant. Therefore, the proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The Appendix B Section 4.2.2 requirement to perform infrared aerial photography reflects a commitment described in Final Environmental Statement Section 5.14.1. Therein it is stated that the preoperational monitoring studies for BV-2 are based primarily on the BV-1 operational monitoring programs. "Results of these studies have shown that there were no BV-1 operational impacts on flora, thus, the only terrestrial monitoring planned for BV-2 is continued infrared aerial photography every other year. The photographs will be compared with preoperational photographs of the BV-2 area, and any signs of injury as a result of salt drift and other sources will be checked. The details of this terrestrial monitoring program will be specified in the Environmental Protection Plan that will be included in Appendix B of the operating license." The subject of this concern is the impact of salt and water drift on area vegetation including sensitive agricultural crops. From the standpoint of soil salinization (the effects of the accumulation of salts in the soil), described in the Environmental Report-Operating License Stage Section 5.3.3, no appreciable impact resulting from operation of the natural draft cooling towers is anticipated. This is based on the average rate of precipitation of 36.2 inches annually which greatly reduces the potential for accumulation of salt in the soil. The terrestrial monitoring program has been

performed in accordance with the Environmental Protection Plan and has provided additional verification that operation of both cooling towers has not produced any evidence of vegetation stress. The proposed change does not introduce any new mode of plant operation or require any physical modification to the plant, therefore, this change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Infrared aerial photography surveillance does not affect safety systems and/or systems important to safety. Terrestrial monitoring is not used in any accident analysis and does not provide a basis for evaluating the radiological consequences of an accident. Deleting the requirement to perform infrared aerial photography will not result in any environmental impact from operation of the cooling tower and will not affect the operation of the cooling tower. The operating history of both the BV-1 and the BV-2 cooling towers has demonstrated that there is no evidence of vegetation stress in accordance with the results obtained from the infrared aerial photography and other associated methods of environmental monitoring. Therefore, based on the above, the proposed change will not involve a significant reduction in a margin of safety.

#### F. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Based on the considerations expressed above, it is concluded that the activities associated with this license amendment request satisfies the no significant hazards consideration standards of 10 CFR 50.92(c) and, accordingly, a no significant hazards consideration finding is justified.

ATTACHMENT C

Beaver Valley Power Station, Unit No. 2  
Proposed Technical Specification Change No. 79

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Applicable Typed Pages



ATTACHMENT TO LICENSE AMENDMENT NO. \_\_\_\_\_

FACILITY OPERATING LICENSE NO. NPF-73

DOCKET NO. 50-412

Replace the following page of Appendix B, Technical Specifications, with the enclosed page as indicated. The revised page is identified by amendment number and contains a vertical line indicating the area of change.

Remove

3

Insert

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(Proposed Wording)

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4.2 Environmental Monitoring

4.2.1 Aquatic Monitoring

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4.2.2 Terrestrial Monitoring

DELETED.

4.2.3 Noise Monitoring

Noise monitoring program during first year of plant operation (Section 5.14.4 of FES).

5.0 Administrative Procedures

5.1 Review and Audit

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