Duquesne Light Company Beaver Valley Power Station Shippingpert, PA 15077-0004 JOHN D. SIEBER February 8, 1991 U. S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555 Beaver Valley Power Station, Unit No. 1 Reference: Docket No. 50-334, License No. DPR-66 Subject: Proposed Operating License Change Request No. 187 (TAC No. 79621) Enclosed are the following: 1. An application for amendment to the above license to revise the Containment Structural Integrity Surveillance Specification 4.6.1.6.1 to add the wording contained in the Standard Technical Specifications.

2. Documents designated Attachments A, B, and C which set forth, respectively, the change in the Technical Specifications, the safety analysis, including the no significant hazards evaluation,

and the typed replacement Technical Specification pages.

On January 25, 1991, we submitted a request for a Temporary Waiver of Compliance in meeting the Beaver Valley Unit No. 1 Technical Specification surveillance requirement 4.6.1.6.1.b which requires removal of containment liner weld test channels if a test channel vent plug is found missing. The request for a Temporary Waiver was initiated due to the discovery on January 22, 1991, of missing vent plugs in the Unit No. 1 containment. These vent plugs are associated with test channels on the containment liner floor which are under approximately two feet of reinforced concrete. Removal of the test channels is considered impractical for determining the adequacy of the liner welds.

A Temporary Waiver was granted to the Duquesne Light Company (DLC) on January 25, 1991, which permits continued plant operation an alternative to the corrective actions specified in Surveillance Requirement (SR) 4.6.1.6.1.b until a change to the Technical Specification can be processed. Enclosed is our proposed change which incorporates an alternative to the prescriptive requirements of SR 4.6.1.6.1.b. This alternative is consistent with the Standard Technical Specification for containment structural integrity, and would be applicable only until the next scheduled Type A leak test (late 1992).

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The permanent long-term solution will be through NRC approval of our proposed Technical Specification Changes No. 181 and 45 submitted on September 28, 1990, for Units 1 and 2, respectively. That submittal was a result of an identical problem identified during the Unit No. 2 second refueling outage. However, an interim solution to the Unit No. 2 concern was approved by the NRC in Technical Specification Amendment No. 34 which was also submitted as an emergency Technical Specification change.

We request that this proposed change be handled as an emergency Technical Specification change in accordance with 10 CFR 50.91(a)(5) because BVPS Unit 1 is presently operating under a Temporary Waiver of Compliance.

Sincerely,

J. D. Sieber Vice President Nuclear Group

cc: Mr. J. Beall, Sr. Resident Ir pector

Mr. T. T. Martin, NRC Region I Administrator

Mr. A. W. DeAgazio, Project Manager

Mr. R. Saunders (VEPCO)