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October 8, 1984

Director of Nuclear Reactor Regulation
United States Juclear Regulatory Commission
Attn: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing
Washington, DC 20555

Reference: Beaver Valley Power Station, Unit No. 1 Docket No. 50-334, License No. DPR-66

Proposed Operating License Change Request No. 94

Gentlemen:

Enclosed are:

- 1) Three (3) originals and thirty-seven (37) copies of an Application for Amendment to our Operating License to incorporate the applicable requirements of NUREG-0737 specified by Generic Letter 83-37.
- 2) Forty (40) copies of documents designated Attachments A and B which setforth the change in technical specifications and its safety evaluation.

Our initial response to the generic letter dated December 7, 1983 forwarded an information copy of the changes that we had identified to comply with the NUREG-0737 requirements and stated that following OSC and ORC review, we would forward the applicable changes for your review. During the Duquesne Light Company review, it was determined that the following deviations from that submittal were appropriate:

- 1) Section 3.3.3.7 Chlorine Detection Systems was to be revised to follow the standard technical specification requirements by requiring only two instead of the presently required three operable chlorine detectors. This was proposed to reduce the number of LER's on this equipment. This change is no longer required since the reporting requirements will be revised by Technical Specification Change No. 90 submitted in response to Generic Letter 83-43. Therefore, Section 3.3.3.7 was removed from this proposed change.
- 2) Tables 3.3-11 and 4.3-7 Accident Monitoring Instrumentation were to be revised to include the Containment Wide Range Pressure instruments. This change is no longer required since we have

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determined that the containment pressure instruments are presently specified in Table 3.3-3 Engineered Safety Feature Actuation System Instrumentation and control room indication is provided to the operator. Therefore, the Containment Wide-Range Pressure instruments have been removed from the above tables since it would be redundant to list these instruments on the accident monitoring as well as ESF tables.

- 3) Section 3.4.12 Reactor Coolant System Vents has been added to this proposed change to reflect the system installed by DCP-295. The limiting condition for operation deviates from the standard technical specification by incorporating a note ** "The valves may be operated for venting operations and leak testing." This will allow the valves to perform the intended function. Action statement "a" has been revised by adding "The provisions of Specification 3.0.4 are not applicable." This will allow entry into an operational mode with one vent path inoperable as permitted by Action statement "a".
- 4) Section 6.8.4 has been revised by changing the title from Post-Accident Sampling to Post-Accident Monitoring since this more adequately describes the program.

A license amendment application fee of \$150.00 will be submitted under separate cover in accordance with 10 CFR 170.

Very truly yours,

Vice President, Nuclear