ATTACHMENT A-1

Revise the Beaver Valley Unit No. 1 Technical Specifications as follows:

Remove Pages	Insert Pages
3/4 6-19c	3/4 6-19c
3/4 6-19k	3/4 6-19k

ATTACHMENT A-2

Revise the Beaver Valley Unit No. 2 Technical Specifications as follows:

Remove Pages	Insert Pages
3/4 6-17	3/4 6-17
3/4 6-18	3/4 6-18
3/4 6-19	3/4 6-19
3/4 6-20	3/4 6-20
3/4 6-22	3/4 6-22
3/4 6-28	3/4 6-28
3/4 6-30	3/4 6-30

TABLE 3.6-1

CONTAINMENT PENETRATIONS

PENT. NO.	AREA	IDENTIFICATION/ DESCRIPTION	INSIDE VALVE	MAXIMUM STROKE TIME*(SEC)	OUTSIDE VALVE	MAXIMUM STROKE TIME*(SEC)
32-C		Deluge System to RHR Area	1FP-800	N/A	TV-1FP-106	N/A
33-C		High Head SI to Hot Legs	(2)1SI-84	N/A	(2)MOV-1SI-869B	N/A
34-A		Spare				
35-A		Seal Injection Water RCP 1A	(10)(2)1CH-181	N/A	(2)MOV-1CH-308A	N/A
36-A		Seal Injection Water RCP 1B	(10)(2)1CH-182	N/A	(2)MOV-1CH-308B	N/A
37-A		Seal Injection Water RCP 1C	(10)(2)1CH-183	N/A	(2)MOV-1CH-308C	N/A
38-A		Containment Sump Pump Discharge	(A)TV-1DA-100A	10	(A)TV-1DA-100B	10
39-C		Steam Generator 1A Blowdown	Closed System	N/A	(2)(A)TV-1BD-100A	20
40-A		Steam Generator 1B Blowdown	Closed System	N/A	(2)(A)TV-1BD-100B	20
41-B		Steam Generator 1C Blowdown	Closed System	N/A	(2)(A)TV-1BD-100C	20
42-C		Compressed Air to Fuel Handling Equipment	1SA-15	N/A	1SA-14	N/A
43-B		Air Activity Monitor-Out	(A)TV-1CV-102-1	5	(A)TV-1CV-102	5
44-B		Air Activity Monitor-In			(A)TV-1CV-101A (A)TV-1CV-101B	5 5
45-B		Primary Grade Water to PRT	1RC-72	N/A	(A)TV-1RC-519	12
46-A		Charging Fill Header	(10)(2)1CH-170	N/A	(2)(1)FCV-1CH-160	N/A
47-B		Instrument Air	1IA-91	N/A	1IA-90	N/A

TABLE 3.6-1

CONTAINMENT PENETRATIONS

PENT. NO.	AREA	IDENTIFICATION/ DESCRIPTION	INSIDE VALVE	MAXIMUM STROKE TIME*(SEC)	OUTSIDE VALVE	MAXIMUM STROKE TIME*(SEC)
Emergency Containment Airlock PH-P-2						
		Equalization Valve	(5)(7)1VS-172	N/A		
		Equalization Valve			(8)(7) 1VS-171	N/A

(A) Containment Isolation Phase A
(B) Containment Isolation Phase B

(1) May be opened on an intermittent basis under administrative control.

(2) Not subject to Type C leakage tests.

(3) May be leakage tested with water as the test fluid.

(4) Maximum opening time.

(5) Applicability: During CORE ALTERATIONS or movement of irradiated fuel within containment. The provisions of specification 3.0.4 are not applicable. The containment Purge Exhaust and Supply valves will be locked shut during operation in Modes 1, 2, 3 and 4.

(6) Not subject to the requirements of specification 3/4.6.3. Listed in TABLE 3.6-1 for information only.

(7) Tested under Type "B" testing.

(8) Temporarily removed and penetration plugged.

(9) Auto open on Safety Injection recirculation signal.

(10) Not subject to the surveillance requirements of specification 3/4.6.3. Valves tested per specification 4.0.5.

Proposed Wording

TABLE 3.6-1

CONTAINMENT PENETRATIONS

PENT. NO.-AREA	IDENTIFICATION/DESCRIPTION	INSIDE VALVE		MAXIMUM STROKE TIME (SEC)	OUTSIDE VALVE		MAXIMUM STROKE TIME (SEC)
1	Comp Cool from Res Heat Exch	(1)(B)	2CCP-MOV157-2 2CCP-RV105	< 60 N/A	(1)(B)	2CCP-MOV157-1	< 60
2	Comp Cool to Res Heat Exch	(1)(B)	2CCP-MOV150-2 2CCP-RV102	< 60 N/A	(1)(B)	2CCP-MOV150-1	< 60
4	Comp Cool to Res Heat Exch	(1)(B)	2CCP-MOV151-2 2CCP-RV103	< 60 N/A	(1)(B)	2CCP-MOV151-1	< 60
5	Comp Cool from Res Heat Exch	(1)(B)	2CCP-MOV156-2 2CCP-RV104	< 60 N/A	(1)(B)	2CCP-MOV156-1	< 60
6	SPARE						
7	High Head Safety Injection	(3)(2)(13)	2SIS-83	N/A	(3)(2)	2SIS-MOV869A	N/A
9	SPARE						
11	Instrument Air	(A)	2IAC-MOV133	< 60	(A)	2IAC-MOV134	< 60
13	SPARE						
14	Chill & Service Wtr to Cont. Air Recirc Cooling coils	(B)	2SWS-MOV153-2	< 60	(B)	2SWS-MOV153-1 2SWS-RV153	< 60 N/A
15	CHARGING	(3)(2)(13)	2CHS-31	N/A	(3)(2)	2CHS-MOV289	< 10
16	SPARE						

TABLE 3.6-1 (Cont)

CONTAINMENT PENETRATIONS

PENT. NO.-AREA	IDENTIFICATION/DESCRIPTION	INSIDE VALVE		MAXIMUM STROKE TIME (SEC)	OUTSIDE VALVE		MAXIMUM STROKE TIME (SEC)
17	High Head Safety Injection	(3)(2) (13)	2SIS-84	N/A	(3)(2)	2SIS-MOV869B	N/A
19	Seal Water from Reactor Coolant Pump	(A)	2CHS-MOV378 2CHS-473	< 60 N/A	(A)	2CHS-MOV381	< 60
20	Safety Injection Accumulator Makeup		2SIS-42	N/A	(1)	2SIS-41 2SIS-RV130	N/A N/A
21	Chill & Service Wtr from Cont. Air Recirc Cooling Coils	(B)	2SWS-MOV155-2	< 60	(B)	2SWS-MOV155-1 2SWS-RV155	< 60 N/A
22	SPARE						
23	SPARE						
24	Residual Heat Removal to Refueling Water Tank		2RHS-107	N/A		2RHS-15 2RHS-RV100	N/A N/A
25	Chill & Service Wtr from Cont. Air Recirc Cooling Coils	(B)	2SWS-MOV154-2	< 60	(B)	2SWS-MOV154-1 2SWS-RV154	< 60 N/A
27	Chill & Service Wtr to Cont. Air Recirc Cooling Coils	(B)	2SWS-MOV152-2	< 60	(B)	2SWS-MOV152-1 2SWS-RV152	< 60 N/A
28	Reactor Coolant Letdown	(A) (A) (A) (1)	2CHS-AOV200A 2CHS-AOV200B 2CHS-AOV200C 2CHS-HCV142 2CHS-RV203	10 10 10 N/A N/A	(A)	2CHS-AOV204	< 60

Proposed Wording

Proposed Wording

TABLE 3.6-1 (Cont)

CONTAINMENT PENETRATIONS

PENT. NO.-AREA	IDENTIFICATION/DESCRIPTION	INSIDE VALVE		MAXIMUM STROKE TIME (SEC)	OUTSIDE VALVE		MAXIMUM STROKE TIME (SEC)
29	Pri Dr. Trans Pump Disch	(A)	2DGS-AOV108A	< 60	(A)	2DGS-AOV108B 2DGS-RV115	< 60 N/A
30	SPARE						
31	SPARE						
32	SPARE						
33	SPARE						
34	High Head Injection Line	(3)(2) (13)	2SIS-94	N/A	(3)(2) (3)(2)	2SIS-MOV836 2SIS-MOV840	N/A N/A
35	Inj Seal Wtr to Reactor Coolant Pump	(3)(2) (13)	2CHS-474	N/A	(2)(3)	2CHS-MOV308A	N/A
36	Inj Seal Wtr to Reactor Coolant Pump	(3)(2) (13)	2CHS-476	N/A	(2)(3)	2CHS-MOV308B	N/A
37	Inj Seal Wtr to Reactor Coolant Pump	(3)(2) (13)	2CHS-475	N/A	(2)(3)	2CHS-MOV308C	N/A
38	Sump Pump Discharge	(A)	2DAS-AOV100A	< 60	(A)	2DAS-AOV100B 2DAS-RV110	< 60 N/A
39	St Gen Blowdown		Closed System	N/A	(2)	2BDG-AOV100A-1	< 60
40	St Gen Blowdown		Closed System	N/A	(2)	2BDG-AOV100B-1	< 60
41	St Gen Blowdown		Closed System	N/A	(2)	2BDG-AOV100C-1	< 60

Proposed Wording

TABLE 3.6-1 (Cont)

CONTAINMENT PENETRATIONS

PENT. NO.-AREA	IDENTIFICATION/DESCRIPTION	INSIDE VALVE		MAXIMUM STROKE TIME (SEC)	OUTSIDE VALVE		MAXIMUM STROKE TIME (SEC)
42	Service Air		2SAS-15	N/A		2SAS-14	N/A
43	Air Monitor Sample		2CVS-93	N/A	(A)	2CVS-SOV102	< 60
44	Air Monitor Sample	(1)(A)	2CVS-SOV153B	< 60	(1)(A)	2CVS-SOV153A	< 60
45	Primary Grade Water		2RCS-72	N/A	(A)	2RCS-AOV519 2RCS-RV100	< 60 N/A
46	Loop Fill	(3)(2)	2CHS-472	N/A	(3)(2)(1)	2CHS-FCV 160	N/A
47	SPARE	(13)					
48	Primary Vent Header	(A)	2VRS-AOV109A-2	< 60	(A)	2VRS-AOV109A-1	< 60
49	Nitrogen Supply Manifold		2RCS-68	N/A	(A)	2RCS-AOV101	< 60
50	SPARE						
51	SPARE						
52	SPARE						
53	Nitrogen Manifold	(A)	2GNS-AOV101-2	< 10	(A)	2GNS-AOV101-1	< 60

Proposed Wording

TABLE 3.6-1 (Cont)

CONTAINMENT PENETRATIONS

PENT. NO.-AREA	IDENTIFICATION/DESCRIPTION	INSIDE VALVE		MAXIMUM STROKE TIME (SEC)	OUTSIDE VALVE		MAXIMUM STROKE TIME (SEC)
60	Low Head Safety Injection Discharge	(3)(2) (13)	2SIS-132	N/A	(3)(2)	2SIS-MOV8888B	N/A
61	Low Head Safety Injection Discharge	(3)(2) (13)	2SIS-130	N/A	(3)(2)	2SIS-MOV8889	N/A
62	Low Head Safety Injection Discharge	(3)(2) (13)	2SIS-133	N/A	(3)(2)	2SIS-MOV8888A	N/A
63	Quench Pump Discharge		2QSS-4	N/A	(B)	2QSS-MOV101A 2QSS-RV101A	< 60 (4) N/A
64	Quench Pump Discharge		2QSS-3	N/A	(B)	2QSS-MOV101B 2QSS-RV101B	< 60 (4) N/A
65	Fuel Transfer Tube	(7)	Flange	N/A			
66	Recirc Spray Pump Suction				(B)(2)	2RSS-MOV155A	< 60 (4)
67	Recirc Spray Pump Suction				(B)(2)	2RSS-MOV155C	< 60 (4)
68	Recirc Spray Pump Suction				(B)(2)	2RSS-MOV155D	< 60 (4)
69	Recirc Spray Pump Suction				(B)(2)	2RSS-MOV155B	< 60 (4)
70	Recirculation Pump Discharge	(2) (13)	2RSS-29	N/A	(B)(2) (6)	2RSS-MOV156A 2RSS-RV156A	< 60 (4) N/A
71	Recirculation Pump Discharge	(2) (13)	2RSS-31	N/A	(10)(B)(2) (6)	2RSS-MOV156C 2RSS-RV156C	< 60 (4) N/A

TABLE 3.6-1 (Cont)

CONTAINMENT PENETRATIONS

PENT. NO.-AREA	IDENTIFICATION/DESCRIPTION	INSIDE VALVE		MAXIMUM STROKE TIME (SEC)	OUTSIDE VALVE		MAXIMUM STROKE TIME (SEC)
105	Leak Detection				(2)	2LMS-SOV951	< 60 (4)
	Leak Detection					2LMS-51	N/A
						2LMS-52	N/A
	Hydrogen Analyzer	(1)	2HCS-SOV133A	N/A	(1)	2HCS-SOV134A	N/A
	Post Accident Sampling	(A)(1)	2PAS-SOV105A-1	< 60	(A)(1)	2PAS-SOV105A-2	< 60
106	Safety Inj. Test Line	(A)	2SIS-MOV842	< 60	(A)	2SIS-AOV889	< 60
						2SIS-RV175	N/A
108	SPARE						
110	SPARE						
113	Safety Injection	(3)(2) (13)	2SIS-95	N/A	(3)(2)	2SIS-MOV867C	< 10 (4)
					(3)(2)	2SIS-MOV867D	< 10 (4)
114	Recirculation Pump Discharge	(2)(13)	2RSS-32	N/A	(10)(B)(2)	2RSS-MOV156D	< 60 (4)
					(6)	2RSS-RV156D	N/A
115	Recirculation Pump Discharge	(2)(13)	2RSS-30	N/A	(B)(2)	2RSS-MOV156B	< 60 (4)
					(6)	2RSS-RV156B	N/A
116	Fire Protection HVR Filter B		2FPW-398	N/A	(A)	2FPW-AOV221	< 60
117	Fire Protection HVR Filter A		2FPW-382	N/A	(A)	2FPW-AOV204	< 60

Proposed Wording

NOTES:

(A) Containment Isolation Phase A.
(B) Containment Isolation Phase B.

(1) May be opened on an intermittent basis under administrative control.

(2) Not subject to Type C leakage tests.

(3) May be leakage tested with water as the test fluid.

(4) Maximum opening time.

(5) Applicability: During CORE ALTERATIONS or movement of irradiated fuel within containment. The provisions of Specification 3.0.4 are not applicable. The containment Purge Exhaust and Supply valves will be locked shut during operation in modes 1, 2, 3, and 4.

(6) Not subject to the requirements of Specification 3/4.6.3. Listed in Table 3.6-1 for information only.

(7) Tested under Type "B" testing.

(8) Temporarily removed and penetration plugged.

(9) Auto open on Safety Injection recirculation signal.

(10) Auto close on Safety Injection recirculation signal.

(11) Auto open on QSS switchover signal.

(12) Isolation is provided by bellows operated hydraulic isolators.

(13) Not subject to the surveillance requirements of specification 3/4.6.3. Valves tested per specification 4.0.5.

Proposed Wording

ATTACHMENT B

Safety Analysis
Proposed Technical Specification Change
Unit No. 1 - Change No. 1A-150
Unit No. 2 - Change No. 2A-5

Description of amendment request: The proposed amendment would exclude all containment isolation weight and spring loaded check valves not subject to containment type C leakage testing from the surveillance requirements for LCO 3.6.3.1 on both Beaver Valley Unit 1 and Unit 2. The current surveillance testing requirements applicable to these valves are items 4.6.3.1.1.a.2 and 4.6.3.1.2.e. These surveillance requirements cycles each of these check valves and verifies that the valves remain closed with < 1.2 psid differential pressure across the valve and opens with the differential pressure ≥ 1.2 psid but less than 6.0 psid. The proposed amendment would add a footnote to Table 3.6-1 excluding the check valves from these surveillance requirements and references the ASME Section XI testing requirements of 4.0.5.

Safety Analysis

Unit 1

The basis for surveillance requirement 4.6.3.1.1.a.2 and 4.6.3.1.2.e is to ensure that applicable containment isolation check valves will remain closed preventing the loss of subatmospheric pressure in the containment following a DBA. The Unit 1 FSAR discusses the design basis of these valves in section 5.3.3. It states that these check valves are designed to require, in order to open, a differential pressure across the valve in the normal flow direction exceeding the expected post DBA differential pressure between atmosphere and containment (about 1.2 psi). As a result, leakage into the containment through incoming lines with check valves inside the containment caused by passive failures of such lines between the containment penetration and the outside isolation valve is prevented.

Amendment No. 67 to the Unit 1 Technical Specifications deleted the containment type C leakage testing requirement for 38 containment isolation valves including the following check valves:

1CH-170
1CH-181
1CH-182
1CH-183

Approval of this change was based on the conclusion that the lines associated with these valves do not represent a potential containment atmospheric leakage path and therefore are not subject to the provisions of 10 CFR 50 Appendix J, Section IIIC. This conclusion was based on the fact that these lines are expected to be operating after a DBA and will be pressurized to well in excess of the peak containment pressure, even in the event of any single failure. It was also demonstrated that these lines would remain filled for the 30-day period following the accident.

The Unit 1 FSAR, Appendix B, Table B.1-1, Structures and Systems Requiring Design for Seismic Loading, states all containment isolation valves and associated piping are seismic qualified. Also, per FSAR Section 5.3.1 the containment isolation system components (piping, valves, penetration, etc) are protected from internally or externally generated missiles and water jets.

Since Technical Specification Amendment No. 65 has demonstrated that these lines are not a potential containment atmosphere leakage path following a DBA and the lines are seismic qualified and missile protected the basis for surveillance requirement 4.6.3.1.1a and 4.6.3 1.2.a are not applicable to the above four valves. Full stroke tests and valve leakage tests with water would continue to be performed where required by ASME Section XI Inservice Testing Program to demonstrate valve operability. This change will therefore not affect the isolation of the containment nor increase the potential for any release of the containment atmosphere following any postulated accidents and is therefore considered safe.

Unit 2

The Unit 2 FSAR discusses containment isolation weight loaded check valves in Section 6.2.4.1 The design basis stated for these valves is to ensure that the valves remain closed when the inside containment atmosphere returns to subatmospheric conditions following a DBA.

As with Unit 1, Unit 2 has excluded certain valves from Type C leakage testing. Unit 2 containment isolation valves not subject to type C leakage testing are listed in Table 6.2-60 of the FSAR. Unit 1 Technical Specification Amendment No. 65 was used as the basis for justifying the exclusion of these valves. This is discussed in the Unit 2 SER dated October 1985, Page 6-18. These valves are excluded from type C leakage testing since they do not present a potential containment atmospheric leakage path. This conclusion is based on the fact that the lines associated with these penetrations are pressurized well in excess of the containment pressure following a DBA and will be filled with water for at least 30 days following the accident. Table 1 provides a list of all weight loaded containment isolation valves not subject to type C leakage testing along with a discussion of the status of these containment penetrations following a DBA.

Per Table 3.2-1 and section 6.2.4.1 of the FSAR all containment isolation valves and the piping between these valves are seismically qualified. In addition, section 6.2.4.1 states that all containment isolation fluid system components have been evaluated for the effects of postulated missiles.

Since the lines associated with the valves listed on Table 1 have been determined to not be a potential containment atmosphere leakage path following a DBA and these penetrations have been protected from line failures from a seismic event and missile effects, these penetrations do not present a potential loss of containment subatmospheric pressure following a DBA. Therefore, the lift check tests required by Technical Specification Surveillance items 4.6.3.1.1.a and 4.6.3.1.2.e should not be applied to these valves. Again, as in Unit 1, full stroke tests and valve leakage tests with water will continue to be performed where required by ASME Section XI Inservice Testing Program to demonstrate valve operability. This change will therefore not affect the isolation of the containment nor increase the potential for any release of the containment atmosphere following any postulated accidents and is therefore considered safe.

TABLE 1

Unit 2 Containment Isolation Weight Loaded Check Valves

Penetration No.	Check Valve	Description	Remarks
7	2SIS*83	High Head Safety Injection to HL	(1)
15	2CHS*31	Charging Header	(1)
17	2SIS*84	High Head Safety Injection to HL	(1)
34	2SIS*94	High Head Safety Injection to CL	(1)
35	2CHS*474	Seal Wtr. Injection to RCP	(1)
36	2CHS*476	Seal Wtr. Injection to RCP	(1)
37	2CHS*475	Seal Wtr. Injection to RCP	(1)
46	2CHS*472	Loop Fill Header	(1)
60	2SIS*132	Low Head Safety Injection Disch.	(2)
61	2SIS*130	Low Head Safety Injection Disch.	(2)
62	2SIS*133	Low Head Safety Injection Disch.	(2)
70	2RSS*29	Recirc. Spray Pump Disch.	(3)
71	2RSS*31	Recirc. Spray Pump Disch.	(3)
113	2SIS*95	High Head Safety Injection to CL	(1)
114	2RSS*32	Recirc. Spray Pump Disch.	(3)
115	2RSS*30	Recirc. Spray Pump Disch.	(3)

(1) These containment penetrations are in the various Safety Injection flow paths during injection and recirculation or have High Head Safety Injection Pump discharge pressure of approximately 2500 psig at their outside containment penetration isolation valve.

(2) These containment penetration lines are in the Low Head Safety Injection flow path or have Low Head Safety Injection discharge pressure of approximately 105 psig at the outside containment penetration isolation valve during injection and recirculation mode.

(3) These containment penetration lines are all pressurized with Recirculation Spray Pump discharge pressure of approximately 115 psig during the injection phase. During the recirculation mode two penetrations continue to see Recirculation Spray Pump discharge flow and the remaining two are pressurized up to the outside containment isolation valve.

ATTACHMENT C

No Significant Hazard Evaluation

Proposed Technical Specification Change
Unit No. 1 - Change No. 1A-150
Unit No. 2 - Change No. 2A-5

Basis for Proposed No Significant Hazards Consideration Determination: The Commission has provided standards for determining whether a significant hazards consideration exists (10 CFR 50.92(c)). A proposed amendment to an operating license for a 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; (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 proposed change does not involve a significant hazards consideration because:

1. The purpose of the Containment Isolation System is to isolate the piping lines which penetrate the containment and to prevent the release of radioactive material from the containment in the event of a LOCA. The capability of the Containment Isolation System to perform this function will not be affected by this change. The capability of maintaining the containment subatmospheric following an accident will also not be affected since the lines associated with this change are not potential containment atmosphere leakage paths. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed change does not reflect any equipment or design change. Thus no adverse safety considerations are introduced by the change. Therefore, the probability of an accident or a malfunction of a different type than previously evaluated would not be created.

3. This change will not affect the assumptions or consequences of any safety analysis presented in the FSAR. Therefore, the change will not involve a significant reduction in a margin of safety.

Based on the above considerations, it is proposed to characterize the change as involving no significant hazards consideration.