ATTACHMENT A-1

Beaver Valley Power Station, Unit No. 1
License Amendment Request No. 270

The following is a list of the affected pages:

Affected Pages: B 3/4 6-11
3/4 2-1
3/4 6-12
3/4 6-14

9907230246 990715
PDR ADOCK 05000334
P PDR

BASES

3/4.6.2.1 and 3/4.6.2.2 CONTAINMENT QUENCH AND RECIRCULATION SPRAY SYSTEMS (Continued)

Verifying that each recirculation spray system pump's developed head at the flow test point is greater than or equal to the required developed head ensures that recirculation spray system pump performance has not degraded during the cycle. The term "required developed head" refers to the value that is assumed in the Containment Integrity Safety Analysis for the recirculation spray pump's developed head at a specific flow point. This value for the required developed head at a flow point is defined as the MOP in the IST Program. The verification that the pump's developed head at the flow test point is greater than or equal to the required developed head is performed by using a MOP curve. The MOP curve is contained in the IST Program and was developed using the required developed head at a specific flow point as a reference point. From the reference point, a curve was drawn which is a constant percentage below the current pump performance curve. Based on the MOP curve, a verification is performed to ensure that the pump's developed head at the flow test point is greater than or equal to the required developed head. Flow and differential head are normal test parameters of centrifugal pump performance required by Section XI of the ASME Code. Since the recirculation spray system pumps cannot be tested with flow through the spray headers, they are tested on bypass flow. This test confirms one point on the pump design curve and is indicative of overall performance. Such inservice tests confirm component OPERABILITY, trend performance, and detect incipient failures by indicating abnormal performance.

3/4.6.2.3 CHEMICAL ADDITION SYSTEM

The OPERABILITY of the chemical addition system ensures that sufficient NaOH is added to the containment spray in the event of a LOCA. The limits on NaOH minimum volume and concentration, ensure that 1) the iodine removal efficiency of the spray water is maintained because of the increase in pH value, and 2) corrosion effects on components within containment are minimized. These assumptions are consistent with the iodine removal efficiency assumed in the accident analyses.

The ten year surveillance interval for performing an air or smoke flow test through each spray header is considered adequate for detecting obstruction of the nozzles due to the passive design of the spray header and the header's components being constructed with stainless steel.

(Proposed Wording)

DPR - 66

3/4.2 POWER DISTRIBUTION LIMITS

3/4.2.1 AXIAL FLUX DIFFERENCE (AFD)

LIMITING CONDITION FOR OPERATION

3.2.1 The indicated AXIAL FLUX DIFFERENCE (AFD) shall be maintained within the target band specified in the CORE OPERATING LIMITS REPORT (COLR).

APPLICABILITY: MODE 1 ABOVE 50% RATED THERMAL POWER*

ACTION:

a. With the indicated AXIAL FLUX DIFFERENCE outside of the target band and with THERMAL POWER:

1. Above 90% of RATED THERMAL POWER, within 15 minutes:

a) Either restore the indicated AFD to within the target band limits, or

b) Reduce THERMAL POWER to less than 90% of RATED THERMAL POWER.

2. Between 50% and 90% of RATED THERMAL POWER:

a) POWER OPERATION may continue provided:

1) The indicated AFD has not been outside of the target band for more than 1 hour penalty deviation cumulative during the previous 24 hours, and

2) The indicated AFD is within the target band. Otherwise, reduce THERMAL POWER to less than 50% of RATED THERMAL POWER within 30 minutes and reduce the Power Range Neutron Flux-High Trip Setpoints to ≤ 55% of RATED THERMAL POWER within the next 4 hours.

acceptable operation limits specified in the COLR.

b) Surveillance testing of the Power Range Neutron Flux Channels may be performed pursuant to Specification 4.3.1.1.1 provided the indicated AFD is maintained within the limits. A total of 16 hours operation may be accumulated with the AFD outside of the target band during this testing without penalty deviation.

* See Special Test Exception 3.10.2

(Proposed Wording)

DPR-66

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

c. At least once per 3 months during shutdown, by:

1. Cycling each power operated (excluding automatic) valve in the flow path that is not testable during plant operation, through at least one complete cycle of full travel.

2. Verifying that each automatic valve in the flow path actuates to its correct position on a test signal.

3. Verifying that each spray pump starts automatically on a test signal. (10)

d. At least once per (5) years by performing an air or smoke flow test through each spray header and verifying each spray nozzle is unobstructed.

(Proposed Wording)

SURVEILLANCE REQUIREMENTS (Continued)

d. Verify, at the frequency specified in the Inservice Testing Program, that each recirculation spray pump's developed head at the flow test point is greater than or equal to the required developed head as specified in the Inservice Testing Program and the Containment Integrity Safety Analysis.

e. At least once per 18 months during shutdown, by:

1. Cycling each power operated (excluding automatic) valve in the flow path not testable during plant operation, through at least one complete cycle of full travel.

2. Verifying that each automatic valve in the flow path actuates to its correct position on a test signal.

3. Initiating flow through each River Water subsystem and its two associated recirculation spray heat exchangers, and verifying a flow rate of at least 8000 gpm.

10

f. At least once per 5 years by performing an air or smoke flow test through each spray header and verifying each spray nozzle is unobstructed.

(Proposed Wording)

ATTACHMENT A-2

Beaver Valley Power Station, Unit No. 2
License Amendment Request No. 146

The following is a list of the affected pages:

Affected Pages: B 3/4 6-10
3/4 2-1
3/4 6-11
3/4 6-13

BASES

3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

3/4.6.2.1 and 3/4.6.2.2 CONTAINMENT QUENCH AND RECIRCULATION SPRAY SYSTEMS

The OPERABILITY of the containment spray systems ensures that containment depressurization and subsequent return to subatmospheric pressure will occur in the event of a LOCA. The pressure reduction and resultant termination of containment leakage are consistent with the assumptions used in the accident analyses.

The recirculation spray system consists of four 50 percent capacity subsystems each composed of a spray pump, associated heat exchanger and flow path. All recirculation spray pumps and motors are located outside containment and supply flow to two 360° recirculation spray ring headers located in containment. One spray ring is supplied by the "A" train subsystem containing recirculation spray pump 2RSS-P21A and the "B" train subsystem containing recirculation spray pump 2RSS-P21D with the other spray ring being supplied by the "A" train subsystem containing recirculation spray pump 2RSS-P21C and the "B" train subsystem containing recirculation spray pump 2RSS-P21B. When the water in the refueling water storage tank has reached a predetermined extreme low level, the C and D subsystems are automatically switched to the cold leg recirculation mode of emergency core cooling system operation.

Verifying that each recirculation spray system pump's developed head at the flow test point is greater than or equal to the required developed head ensures that recirculation spray system pump performance has not degraded during the cycle. The term "required developed head" refers to the value that is assumed in the Containment Integrity Safety Analysis for the recirculation spray pump's developed head at a specific flow point. This value for the required developed head at a flow point is defined as the Minimum Operating Point (MOP) in the Inservice Testing Program. Flow and differential head are normal test parameters of centrifugal pump performance required by Section XI of the ASME Code. Since the recirculation spray system pumps cannot be tested with flow through the spray headers, they are tested on bypass flow. This test confirms one point on the pump design curve and is indicative of overall performance. Such inservice tests confirm component OPERABILITY, trend performance, and detect incipient failures by indicating abnormal performance.

The ten year surveillance interval for performing an air or smoke flow test through each spray header is considered adequate for detecting obstruction of the nozzles due to the passive design of the spray header and the header's components being constructed with stainless steel.

Revised by NRC letter dated May 7, 1996

NPF-73

3/4.2 POWER DISTRIBUTION LIMITS

3/4.2.1 AXIAL FLUX DIFFERENCE (AFD)

LIMITING CONDITION FOR OPERATION

3.2.1 The indicated AXIAL FLUX DIFFERENCE (AFD) shall be maintained within the target band specified in the CORE OPERATING LIMITS REPORT (COLR).

APPLICABILITY: MODE 1 above 50 Percent RATED THERMAL POWER*

ACTION:

a. With the indicated AXIAL FLUX DIFFERENCE outside of the target band and with THERMAL POWER:

1. Above 90 percent of RATED THERMAL POWER, within 15 minutes:

a) Either restore the indicated AFD to within the target band limits, or

b) Reduce THERMAL POWER to less than 90 percent of RATED THERMAL POWER.

2. Between 50 percent and 90 percent of RATED THERMAL POWER:

a) POWER OPERATION may continue provided:

1) The indicated AFD has not been outside of the target band for more than 1 hour penalty deviation cumulative during the previous 24 hours, and

2) The indicated AFD is within the acceptable operation limits specified in the COLR. target band. Otherwise, reduce THERMAL POWER to less than 50 percent of RATED THERMAL POWER within 30 minutes and reduce the Power Range Neutron Flux-High Trip Setpoints to ≤ 55 percent of RATED THERMAL POWER within the next 4 hours.

b) Surveillance testing of the Power Range Neutron Flux Channels may be performed pursuant to Specification 4.3.1.1.1 provided the indicated AFD is maintained within the limits. A total of 16 hours operation may be accumulated with the AFD outside of the target band during this testing without penalty deviation.

*See Special Test Exception 3.10.2

(Proposed Wording)

SURVEILLANCE REQUIREMENTS (Continued)

2. Verifying that each automatic valve in the flow path actuates to its correct position on a test signal.

3. Verifying that each spray pump starts automatically on a test signal.

d. At least once per (5) 10 years by performing an air or smoke flow test through each spray header and verifying each spray nozzle is unobstructed.

(Proposed Wording)

SURVEILLANCE REQUIREMENTS (continued)

d. Verify, at the frequency specified in the Inservice Testing Program, that each recirculation spray pump's developed head at the flow test point is greater than or equal to the required developed head as specified in the Inservice Testing Program and the Containment Integrity Safety Analysis.

e. At least once per 18 months during shutdown, by:

1. Cycling each power operated (excluding automatic) valve in the flow path not testable during plant operation, through at least one complete cycle of full travel.

2. Verifying that each automatic valve in the flow path actuates to its correct position on a test signal.

3. Initiating flow through each Service Water subsystem and its two associated recirculation spray heat exchangers, and verifying a flow rate of at least 11,000 gpm.

(10)

f. At least once per (5) e years by performing an air or smoke flow test through each spray header and verifying each spray nozzle is unobstructed.

(Proposed Wording)

ATTACHMENT B

Beaver Valley Power Station, Unit Nos. 1 and 2
License Amendment Request No. 270 AND 146
REVISION OF CONTAINMENT SPRAY SYSTEM NOZZLE SURVEILLANCE INTERVAL

A. DESCRIPTION OF AMENDMENT REQUEST

This license amendment request revises the frequency of performing the air or smoke flow surveillance test through the Quench Spray System and Recirculation Spray System spray headers and spray nozzles to verify unobstructed flow as specified in the Beaver Valley Power Station (BVPS) Unit No. 1 Technical Specification (TS) 4.6.2.1.d for the Quench Spray System and TS 4.6.2.2.f for the Recirculation Spray System, and in the BVPS Unit No. 2 TS 4.6.2.1.d for the Quench Spray System and TS 4.6.2.2.f for the Recirculation Spray System.

As documented in Generic Letter 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operations," dated September 27, 1993, the NRC completed a comprehensive examination of surveillance requirements in technical specifications that require testing at power. In addition, several changes in surveillance intervals for tests performed during shutdown were recommended. Specifically, Generic Letter 93-05 supports a reduction in nozzle test frequency for stainless steel spray systems. Consistent with Generic Letter 93-05, a change is being requested to the surveillance frequency from five years to ten years for the spray nozzles in the Containment Spray and Recirculation Spray Systems at BVPS Unit No. 1 and 2.

This license amendment also revises the Action criteria in the BVPS Unit 1 and 2 Axial Flux Difference technical specification to correct the terminology referring to the Core Operating Limits Report (COLR) limits. This addresses an incorrect use of terminology and the revision does not involve a technical intent change. This change is consistent with the current Technical Specification 3/4.2.1 Bases.

B. DESIGN BASES

The BVPS Unit No. 1 and 2 containment depressurization system consists of the Quench Spray System and the Recirculation Spray System. These systems are described in Section 6.4 of the BVPS Unit 1 UFSAR and in Section 6.2.2 of the BVPS Unit 2 UFSAR. These spray systems are an engineered safety feature which have a dual function of removing heat and fission product iodine from the post-accident containment atmosphere. These spray systems serve no function during normal operation.

These spray systems reduce the containment temperature and returns the containment pressure to subatmospheric following a postulated design basis accident involving a break in either the primary or secondary system piping inside the containment. Heat

that is removed from the containment atmosphere by the spray systems is transferred to the containment sump. Heat is then removed from the containment by the river water/service water via the recirculation spray heat exchangers for Unit 1 and 2, respectively.

The Quench Spray System and Recirculation Spray System at both BVPS Units utilize stainless steel nozzles to spray water into the containment atmosphere to reduce the containment temperature and remove iodine during a design basis accident inside containment.

The Axial Flux Difference (AFD) Technical Specification establishes limits on the axial power distribution to limit skewing to either the top or bottom of the core. Limiting power distribution skewing helps to ensure that core peaking factors remain consistent with the assumptions used in the safety analyses. The power density at any point in the core must be limited, so that the fuel design criteria are maintained. Together, the SDM, shutdown and control bank insertion and alignment limits, AFD, and quadrant power tilt ratio (QPTR) provide limits on control component operation and on monitored process variables, which ensure that the core operates within the fuel design criteria.

C. JUSTIFICATION

The proposed changes to the surveillance requirements for the Quench Spray and Recirculation Spray Systems' nozzles are consistent with Generic Letter 93-05. NUREG-1366 concluded that the corrosion of stainless steel piping is negligible during the proposed extended surveillance interval, since the Quench Spray and Recirculation Spray Systems are maintained dry and there are no additional mechanisms that could reasonably be postulated to cause blockage of the spray systems' nozzles.

The associated piping in the BVPS Unit No. 1 Quench Spray and Recirculation Spray System is stainless steel. The spray systems' nozzles were replaced via a design change in 1979 and are stainless steel. The function of the air flow surveillance testing is to ensure that the flow path through the spray nozzles is not blocked. The air flow surveillance testing conducted at BVPS Unit No. 1 in 1980 (following the design change), 1984, 1989, and 1995 did not identify any obstructed or clogged spray systems' nozzles.

The associated piping and spray nozzles in the BVPS Unit No. 2 Quench Spray and Recirculation Spray System are stainless steel. The air flow surveillance testing conducted at BVPS Unit No. 2 in 1986 (during pre-operational startup testing), 1990, and 1995 did not identify any obstructed or clogged spray systems' nozzles.

These spray systems serve no function during normal operation. Because these systems are not used during normal operation, there are no credible mechanisms by which these nozzles could be rendered nonfunctional. Thus the proposed changes are compatible with the plant operating experience at BVPS Unit No. 1 and 2.

Therefore, the proposed reduced testing frequency of the Quench Spray and Recirculation Spray Systems remains adequate to ensure operability of the nozzles to mitigate the consequences of a design basis accident.

The proposed change to the Bases page for the Containment Quench and Recirculation Spray Systems identifies that the ten year surveillance interval for performing an air or smoke flow test through each spray header is considered adequate for detecting obstruction of the nozzles due to the passive design of the spray header and the header's components being constructed with stainless steel. This is consistent with the bases provided for the reduced testing frequency.

Technical Specification 3.2.1 contains the requirements applicable to the AFD. The operating limits associated with AFD are contained within the Core Operating Limits Report (COLR) including the target band referred to in the LCO. Action a of Technical Specification 3.2.1 is applicable when the indicated axial flux difference is outside the target band. Action a.2 is then applicable when thermal power is between 50% and 90% of rated thermal power and AFD is outside the target band. Action a.2 contains two subsequent actions that must be met, a.2.a)1) and a.2.a)2). The first sentence of Action a.2.a)2) states; "The indicated AFD is within the target band." However, Action a is only applicable if AFD is outside of the target band. The first sentence of Action a.2.a)2) contradicts the plant condition for which the action is intended to be applied. The intent of the first sentence of this action is to express the plant condition when AFD is outside the target band but within the acceptable operating limits specified for AFD in the COLR. In this situation, operation may continue under the provisions of Action a.2.a). The COLR now contains the operating limits applicable to AFD including the target band. In the License Amendment that removed the AFD limits from the Technical Specifications and placed them in the COLR, the term target band was inadvertently applied in Action a.2.a)2). The recommended change would clarify the plant condition stated in the action as AFD outside the target band but still within the operating limits specified in the COLR.

The proposed change revises Action a.2.a)2) to replace the phrase "target band" with the phrase "acceptable operation limits specified in the COLR." The proposed change does not alter the original intent of the action statement but corrects the inadvertent and confusing use of the term "target band" in that action. The proposed change also incorporates the terminology

(acceptable operation limits) used in the corresponding action condition of the Improved Standard Technical Specifications (ISTS). As such, this change is considered an administrative clarification that makes the action more understandable and more consistent with the terminology used in the ISTS.

The addition of the unit license number at the top of several of the proposed pages is an editorial administrative change to address site records criteria. Other editorial changes include the addition of the section number to the header, a period in the Applicability, and changing the capitalization of the first Action from 'A' to 'a' for Technical Specification 3.2.1.

D. SAFETY ANALYSIS

The proposed changes to the surveillance requirements for the Quench Spray System and Recirculation Spray System nozzles are consistent with the intent of Generic Letter 93-05. NUREG-1366 concluded that the corrosion of stainless steel piping is negligible during the proposed extended surveillance interval of 10 years, since the spray systems are maintained dry and there are no additional mechanisms that could reasonably be postulated to cause blockage of the spray systems' nozzles.

The air flow surveillance testing conducted at BVPS Unit No. 1 in 1980, 1984, 1989, and 1995 did not identify any obstructed spray systems nozzles and the air flow surveillance testing conducted at BVPS Unit No. 2 in 1986, 1990 and 1995 also did not identify any obstructed spray systems nozzle. Thus, this change to the surveillance criteria and its associated Bases page is compatible with the plant operating experience at BVPS Unit No. 1 and 2.

Therefore, the proposed reduced testing frequency of the spray systems' nozzles remains adequate to ensure operability of the nozzles to mitigate the consequences of a Design Basis Accident.

The AFD specification establishes limits on the axial power distribution to limit skewing to either the top or bottom of the core. Limiting power distribution skewing helps to ensure that core peaking factors remain consistent with the assumptions used in the safety analyses. The limits for AFD are contained within the COLR.

The proposed change affects Action a.2.a)2) of Specification 3.2.1 for both BVPS Unit 1 and Unit 2 Technical Specifications. This Action is requested to be modified by replacing the phrase "target band" with the phrase "acceptable operation limits specified in the COLR." The current Action a.2.a)2) is inconsistent with Action a.1.a. Current Action a.2.a)2) is bounded by the lead statement of Action a which states "With the indicated AXIAL FLUX DIFFERENCE outside of the target band." The plant can not be both 'outside' and 'within' the target band at the same time. The proposed change does not alter the original

intent of the action statement but corrects the inadvertent and confusing use of the term target band in that Action. The proposed change incorporates the terminology (acceptable operation limits) used in the corresponding Action condition of the ISTS. The proposed change does not alter the AFD limits specified in the COLR and the AFD specification continues to assure plant operation within those limits. With AFD within the acceptable operation limits specified in the COLR, the resulting axial power distribution remains within the initial conditions assumed in the safety analyses. This change is consistent with the current Technical Specification 3/4.2.1 Bases. Therefore, based on the above, these changes are acceptable and will not adversely affect the safety of the plant.

The addition of the unit license number at the top of the page is an editorial administrative change to address site records criteria. Other editorial changes include the addition of the section number to the header, a period in the Applicability, and changing the capitalization of the Action a.

E. NO SIGNIFICANT HAZARDS EVALUATION

The no significant hazard considerations involved with the proposed amendment have been evaluated. The evaluation focusing on the three standards set forth in 10 CFR 50.92(c) are 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 extension of the testing frequency of the Quench Spray and Recirculation Spray Systems' nozzles to ten years does not change the way these systems are operated or their

operability requirements. The proposed change to the surveillance frequency of safety equipment has no impact on the probability of an accident occurrence nor can it create a new or different type of accident. NUREG-1366, "Improvements to Technical Specifications Surveillance Requirements," dated December 1992, and Generic Letter 93-05, "Line Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation," dated September 27, 1993, concluded that the corrosion of stainless steel piping is negligible during the extended surveillance interval for nozzle testing. The results of the above NRC study were evaluated by Duquesne Light Company and found to be applicable to BVPS Unit 1 and 2. Since the Quench Spray and Recirculation Spray Systems are maintained dry, there is no additional mechanism that could cause blockage of the spray nozzles. Thus, the nozzles in these spray systems are expected to remain operable during the ten year surveillance interval to mitigate the consequence of an accident previously evaluated. No obstructed or clogged spray systems' nozzles have been observed during the five year frequency surveillance tests at either BVPS Unit 1 or Unit 2 to date. Testing of the spray systems' nozzles at the proposed reduced frequency will not increase the probability of occurrence of a postulated accident or the consequences of an accident previously evaluated.

This license amendment also revises the Action criteria in the BVPS Unit 1 and 2 Axial Flux Difference technical specification to correct the terminology referring to the Core Operating Limits Report (COLR) limits. The proposed change incorporates the terminology (acceptable operation limits) used in the corresponding Action condition of the ISTS. The proposed change does not alter the AFD limits specified in the COLR and the AFD specification continues to assure plant operation within those limits. With AFD within the acceptable operation limits specified in the COLR, the resulting axial power distribution remains within the initial conditions assumed in the safety analyses. Therefore, these changes will not increase the probability of occurrence of a postulated accident or the 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 proposed reduced frequency testing of the Quench Spray and Recirculation Spray Systems' nozzles does not change the way the spray systems are operated. The reduced frequency of testing the spray nozzles does not change the plant operation or system readiness. The reduced frequency testing of the Quench Spray and Recirculation Spray Systems' nozzles does not generate any new accident precursors. Therefore, the possibility of a new or different kind of

accident previously evaluated is not created by the proposed changes in surveillance frequency of the spray systems' nozzles.

This license amendment also revises the Action criteria in the BVPS Unit 1 and 2 Axial Flux Difference technical specification to correct the terminology referring to the Core Operating Limits Report (COLR) limits. This addresses an incorrect use of terminology and the revision does not involve a technical intent change. Therefore, the possibility of a new or different kind of accident previously evaluated is not created by the proposed terminology correction.

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

The proposed amendment does not involve revisions to any safety limits or safety system setting that would adversely impact plant safety. The proposed amendment does not affect the ability of systems, structures or components important to the mitigation and control of design bases accident conditions within the facility. In addition, the proposed amendment does not affect the ability of safety systems to ensure that the facility can be maintained in a shutdown or refueling condition for extended periods of time.

Reduced testing of the Quench Spray and Recirculation Spray Systems' nozzles does not change the way these spray systems are operated or these spray systems' operability requirements. Generic Letter 93-05 and NUREG-1366 concluded that the corrosion of stainless steel piping is negligible during the extended surveillance interval for nozzle testing. The results of the above NRC study were evaluated by Duquesne Light Company and found to be applicable to BVPS Unit 1 and 2. Since the Quench Spray and Recirculation Spray Systems are maintained dry, there is no additional mechanism that could cause blockage of these spray systems' nozzles. Thus, the proposed reduced testing frequency is adequate to ensure spray nozzle operability. The surveillance requirements do not affect the margin of safety in that the operability requirements of the Quench Spray and Recirculation Spray Systems remain unaltered. The existing safety analyses remain bounding. Therefore, the margin of safety is not adversely affected.

This license amendment also revises the Action criteria in the BVPS Unit 1 and 2 Axial Flux Difference technical specification to correct the terminology referring to the Core Operating Limits Report (COLR) limits. This addresses an incorrect use of terminology and the revision does not involve a technical intent change. The operating criteria on Axial Flux Difference are not altered from their intended

requirements. Therefore, the margin of safety is not adversely affected by the proposed terminology correction.

F. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

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

G. ENVIRONMENTAL CONSIDERATION

This license amendment request changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. It has been determined that this license amendment request involves no significant increase in the amount, and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. This license amendment request may change requirements with respect to installation or use of a facility component located within the restricted area or change an inspection or surveillance requirement; however, the category of this licensing action does not individually or cumulatively have a significant effect on the human environment. Accordingly, this license amendment request meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this license amendment request.

H. UFSAR CHANGES

This proposed license amendment would not result in any changes to either the BVPS Unit 1 or Unit 2 UFSAR.