ATTACHMENT A

Revise the Technical Specification as follows:

Remove Page	Insert Page
3/4 11-6	3/4 11-6
3/4 11-8	3/4 11-8
3/4 11-9	-
3/4 11-10	3/4 11-10
3/4 11-11	3/4 11-11
3/4 11-13	3/4 11-13
3/4 11-14	3/4 11-14
3/4 11-15	3/4 11-15
3/4 11-16	3/4 11-16
3/4 11-18	3/4 11-18
3/4 11-21	3/4 11-21
3/4 11-23	3/4 11-23
B3/4 11-3	B3/4 11-3
5-1b	5-1b
5-1c	-

RADIOACTIVE EFFLUENTS

DOSE

LIMITING CONDITION FOR OPERATION

3.11.1.2 The dose or dose commitment to MEMBER(S) OF THE PUBLIC from radioactive materials in liquid effluents released from each reactor unit from the site (see Figure 5.1-1) shall be limited:

a. During any calendar quarter to less than or equal to 1.5 mrem to the total body and to less than or equal to 5 mrem to any organ, and

b. During any calendar year to less than or equal to 3 mrem to the total body and to less than or equal to 10 mrem to any organ.

APPLICABILITY: At all times.

ACTION:

a. With the calculated dose from the release of radioactive materials in liquid effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report which identifies the cause(s) for exceeding the limit(s) and defines the corrective actions to be taken to reduce the releases, and the proposed corrective actions to be taken to assure the subsequent releases will be within the above limits. (This Special Report shall also include (1) the results of radiological analyses of the drinking water source and (2) the radiological impact on finished drinking water supplies with regard to the requirements of 40 CFR 141, Safe Drinking Water Act).*

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

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*Applicable only if drinking water supply is taken from the receiving water body within 3 miles of the plant discharge (3 miles downstream only).

RADIOACTIVE EFFLUENTS

LIQUID WASTE TREATMENT

LIMITING CONDITION OF OPERATION

3.11.1.3 The Liquid Radwaste Treatment System shall be used to reduce the radioactive materials in each liquid waste batch prior to its discharge when the projected doses due to liquid effluent releases from each reactor unit from the site (See Figure 5.1-1) when averaged over 31 days would exceed 0.06 mrem to the total body or 0.2 mrem to any organ.

APPLICABILITY: At all times.

ACTION:

a. With liquid waste being discharged without treatment and exceeding the limits specified, prepare and submit to the Commission within 30 days pursuant to Specification 6.9.2 a Special Report which includes the following information:

   1. Identification of the inoperable equipment or subsystems and the reason for inoperability.

   2. Action(s) taken to restore the inoperable equipment to operational status, and

   3. Summary description of action(s) taken to prevent a recurrence.

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.3.1 Doses due to liquid releases shall be projected at least once per 31 days, in accordance with the ODCM.

RADIOACTIVE EFFLUENTS

LIQUID HOLDUP TANKS

LIMITING CONDITION FOR OPERATION

3.11.1.4 The quantity of radioactive material contained in each of the following tanks shall be limited to $\leq$ 10 curies, excluding tritium and dissolved or entrained noble gases.

a. BR-TK-6A (Primary Water Storage Tank)

b. BR-TK-6B (Primary Water Storage Tank)

c. LW-TK-7A (Steam Generator Drain Tank)

d. LW-TK-7B (Steam Generator Drain Tank)

e. Miscellaneous temporary outside radioactive liquid storage tanks.

APPLICABILITY: At all times.

ACTION:

a. With the quantity of radioactive material in any of the above listed tanks exceeding the above limit, immediately suspend all additions of radioactive material to the tank and within 48 hours reduce the tank contents to within the limit, and

b. Submit a Special Report to the Commission within 30 days pursuant to Specification 6.9.2 and include a schedule and a description of activities planned and/or taken to reduce the contents to within the specified limits.

c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.4.1 The quantity of radioactive material contained in each of the above listed tanks shall be determined to be within the above limit by analyzing a representative sample of the tank's contents at least once per 7 days when radioactive materials are being added to the tank.

RADIOACTIVE EFFLUENTS

3/4.11.2 GASEOUS EFFLUENTS

DOSE RATE

LIMITING CONDITION FOR OPERATION

3.11.2.1 The dose rate in the unrestricted areas (see Figure 5.1-1) due to radioactive materials released in gaseous effluents from the site shall be limited to the following values:

a. The dose rate limit for noble gases shall be $\leq$ 500 mrem/yr to the total body and $\leq$ 3000 mrem/yr to the skin*, and

b. The dose rate limit, inhalation pathway only, for I-131, tritium and all radionuclides in particulate form (excluding C-14) with half-lives greater than 8 days shall be $\leq$ 1500 mrem/yr to any organ.

APPLICABILITY: At all times.

ACTION:

a. With the dose rate(s) exceeding the above limits, immediately decrease the release rate to comply with the above limit(s), and

b. Submit a Special Report to the Commission within 30 days pursuant to Specification 6.9.2.

c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.1.1 The dose rate due to noble gaseous effluents shall be determined to be within the above limits in accordance with the methods and procedures of the ODCM.

*During containment purge the dose rate may be averaged of over 960 minutes.

TABLE 4.11-2

RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM

Gaseous Release Type	Sampling Frequency	Minimum Analysis Frequency	Type of Activity Analysis	Lower Limit of Detection (LLD) (μCi/ml)[a]
A. Waste Gas Storage Tank	P Each Tank Grab Sample	P Each Tank	Principal Gamma Emitters[g]	1×10^{-4}
			H-3	1×10^{-6}
B. Containment Purge	P Each Purge[b] Grab Sample	P Each Purge[b]	Principal Gamma Emitters[g]	1×10^{-4}
			H-3	1×10^{-6}
C. Ventilation Systems 1. Process Vent 2. Containment Vent 3. Aux. Bldg. Vent	M[b,c,e] Grab Sample	M[b]	Principal Gamma Emitters[g]	1×10^{-4}
			H-3	1×10^{-6}
	Continuous[f]	W[d] Charcoal Sample	I-131	1×10^{-12}
			I-133	1×10^{-10}
	Continuous[f]	W[d] Particulate Sample	Principal Gamma Emitters[g] (I-131, Others)	1×10^{-11}
	Continuous[f]	M Composite Particulate Sample	Gross alpha	1×10^{-11}
	Continuous[f]	Q Composite Particulate Sample	Sr-89, Sr-90	1×10^{-11}
	Continuous[f]	Noble Gas Monitor	Noble Gases Gross Beta and Gamma	1×10^{-6}

TABLE 4.11-2 (Continued)

TABLE NOTATION

a. The Lower Limit of Detection (LLD) is defined in Table Notation (a) of Table 4.11-1 of Specification 4.11.1.1.

b. When reactor coolant system activity exceeds the limits stated in Specification 3.4.8, analyses shall be performed once every 24 hours during startup, shutdown and 25% load changes and 72 hours after achieving the maximum steady state power operation unless continuous monitoring is provided.

c. Tritium grab samples shall be taken at least once per 24 hours (from the appropriate ventilation release pathway) when the refueling canal is flooded.

d. Samples shall be changed at least once per 7 days and analyses shall be completed within 48 hours after changing (or after removal from sampler). Sampling and analyses shall also be performed at least once per 24 hours, during startup, shutdown and 25% load changes and 72 hours after achieving the maximum steady state power operation when RCS activity exceeds the limits in Specification 3.4.8 unless continuous monitoring is provided. When samples collected for 24 hours are analyzed, the corresponding LLD's may be increased by a factor of 10.

e. Tritium grab samples shall be taken at least once per 7 days from the ventilation exhaust from the spent fuel pool area, whenever spent fuel is in the spent fuel pool.

f. The average ratio of the sample flow rate to the sampled stream flow rate shall be known for the time period covered by each dose or dose rate calculation made in accordance with Specification 3.11.2.1, 3.11.2.2 and 3.11.2.3.

g. The principal gamma emitters for which the LLD specification will apply are exclusively the following radionuclides: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135, and Xe-138 for gaseous emissions and Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137, Ce-141, and Ce-144 for particulate emissions. This list does not mean that only these nuclides are to be detected and reported. Other peaks which are measurable and identifiable, together with the above nuclides, shall also be identified and reported. Nuclides which are below the LLD for the analyses should not be reported as being present at the LLD level for that nuclide. When unusual circumstances result in LLD's higher than required, the reasons shall be documented in the semi-annual effluent report.

RADIOACTIVE EFFLUENTS

DOSE, NOBLE GASES

LIMITING CONDITION FOR OPERATION

3.11.2.2 The air dose due to noble gases released in gaseous effluents from each reactor unit from the site (see Figure 5.1-1) shall be limited to the following:

a. During any calendar quarter to ≤ 5 mrad for gamma radiation and ≤ 10 mrad for beta radiation.

b. During any calendar year, to ≤ 10 mrad for gamma radiation and ≤ 20 mrad for beta radiation.

APPLICABILITY: At all times

ACTION:

a. With the calculated air dose from radioactive noble gases in gaseous effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report which identifies the cause(s) for exceeding the limit(s) and defines the corrective actions taken to reduce the releases and the proposed corrective actions to be taken to assure the subsequent releases will be within the above limits.

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.2.1 Dose Calculations. Cumulative dose contributions shall be determined in accordance with the ODCM at least once every 31 days.

RADIOACTIVE EFFLUENTS

DOSE, RADIOIODINES, RADIOACTIVE MATERIAL IN PARTICULATE FORM, AND RADIONUCLIDES OTHER THAN NOBLE GASES

LIMITING CONDITION FOR OPERATION

3.11.2.3 The dose to MEMBER(s) OF THE PUBLIC from radioiodines and radioactive materials in particulate form (excluding C-14), and radionuclides (other than noble gases) with half-lives greater than 8 days in gaseous effluents released from each reactor unit from the site (see Figure 5.1-1) shall be limited to the following:

a. During any calendar quarter to $\leq$ 7.5 mrem to any organ, and

b. During any calendar year to $\leq$ 15 mrem to any organ.

APPLICABILITY: At all times.

ACTION:

a. With the calculated dose from the release of radioiodines, radioactive materials in particulate form, (excluding C-14), and radionuclides (other than noble gases) with half lives greater than 8 days, in gaseous effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report, which identifies the cause(s) for exceeding the limit and defines the corrective actions taken to reduce the releases and the proposed corrective actions to be taken to assure the subsequent releases will be within the above limits.

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable

SURVEILLANCE REQUIREMENTS

4.11.2.3.1 Dose Calculations. Cumulative dose contributions shall be determined in accordance with the ODCM at least once every 31 days.

RADIOACTIVE EFFLUENTS

GASEOUS RADWASTE TREATMENT

LIMITING CONDITION FOR OPERATION

3.11.2.4 The Gaseous Radwaste Treatment System and the Ventilation Exhaust Treatment System shall be used to reduce radioactive materials in gaseous waste prior to their discharge when the projected gaseous effluent air doses due to gaseous effluent releases from each reactor unit from the site (see Figure 5.1-1), when averaged over 31 days, would exceed 0.2 mrad for gamma radiation and 0.4 mrad for beta radiation. The appropriate portions of the Ventilation Exhaust Treatment System shall be used to reduce radioactive materials in gaseous waste prior to their discharge when the projected doses due to gaseous effluent releases from each reactor unit from the site (see Figure 5.1-1) when averaged over 31 days would exceed 0.3 mrem to any organ.

APPLICABILITY: At all times.

ACTION:

a. With gaseous waste being discharged without treatment and in excess of the above limits, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report which includes the following information:

   1. Identification of the inoperable equipment or subsystems and the reason for inoperability,

   2. Action(s) taken to restore the inoperable equipment to operational status, and

   3. Summary description of action(s) taken to prevent a recurrence.

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable

SURVEILLANCE REQUIREMENTS

4.11.2.4.1 Doses due to gaseous releases from the site shall be projected at least once per 31 days, in accordance with the ODCM.

RADIOACTIVE EFFLUENTS

EXPLOSIVE GAS MIXTURE

LIMITING CONDITION FOR OPERATION

3.11.2.6 The concentration of oxygen in the waste gas holdup system shall be limited to $\leq$ 2% by volume whenever the hydrogen concentration exceeds 4% by volume.

APPLICABILITY: At all times.

ACTION:

a. With the concentration of oxygen in the waste gas holdup system > 2% by volume but $\leq$ 4% by volume, immediately suspend all additions of waste gases to the gaseous waste decay tank and reduce the concentration of oxygen to $\leq$ 2% by volume within 48 hours.

b. With the concentration of oxygen in the waste gas holdup system greater than 4% by volume and the hydrogen concentration greater than 4% by volume, immediately suspend all additions of waste gases to the affected tank and reduce the concentration of oxygen to less than or equal to 4% by volume, then take ACTION a, above.

c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.6.1 The concentrations of oxygen in the waste gas holdup system shall be determined to be within the above limits by continuously monitoring the waste gases in the waste gas holdup system with the oxygen monitors required OPERABLE by Table 3.3-13 of Specification 3.3.3.10 or monitoring in conjunction with its associated action statement.

RADIOACTIVE EFFLUENTS

3/4.11.4 TOTAL DOSE

LIMITING CONDITION FOR OPERATION

3.11.4.1 The dose or dose commitment to MEMBER(S) OF THE PUBLIC from all facility releases is limited to $\leq$ 25 mrem to the total body or any organ (except the thyroid, which is limited to $\leq$ 75 mrem) for a calendar year.

APPLICABILITY: At all times.

ACTION:

a. With the calculated dose from the release of radioactive materials in liquid or gaseous effluents exceeding twice the limits of Specifications 3.11.1.2.a, 3.11.1.2.b, 3.11.2.2.a, 3.11.2.2.b, 3.11.2.3.a, or 3.11.2.3.b, prepare and submit a Special Report to the Commission within 30 days pursuant to Specification 6.9.2 defining the corrective action and limit the subsequent releases such that the dose or dose commitment to MEMBER(S) OF THE PUBLIC is limited to $\leq$ 25 mrem to the total body or any organ (except thyroid, which is limited to $\leq$ 75 mrem) for a calendar year. This special report shall describe the steps to be taken or modifications necessary to prevent a recurrence. Otherwise, obtain a variance from the Commission to permit releases which exceed the 40 CFR 190 Standard.

b. The provisions of Specification 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.4.1.1 Dose Calculations. Cummulative dose contributions from liquid and gaseous effluents shall be determined in accordance with Specification 3.11.1.2.a, 3.11.1.2.b, 3.11.2.2.a, 3.11.2.2.b, 3.11.2.3.a, and 3.11.2.3.b, and in accordance with the ODCM.

for unrestricted areas. The annual dose limits are the doses associated with the concentrations of 10 CFR Part 20, Appendix B, Table II, Column 1. These limits provide reasonable assurance that radioactive material discharged in gaseous effluents will not result in the exposure of an individual in an unrestricted area, either within or outside the site boundary, to annual average concentrations exceeding the limits specified in Appendix B, Table II of 10 CFR Part 20 (10 CFR Part 20.106(b)). For individuals who may at times be within the site boundary, the occupancy of the individual will be sufficiently low to compensate for any increase in the atmospheric diffusion factor above that for the site boundary. The specified release rate limits restrict, at all times, the corresponding gamma and beta dose rates above background to an individual at or beyond the exclusion area boundary to $\leq$ 500 mrem/year to the total body or to $\leq$ 3,000 mrem/year to the skin. These release rate limits also restrict, at all times, the corresponding thyroid dose rate above background to a child via the inhalation pathway to $\leq$ 1,500 mrem/year.

This specification applies to the release of gaseous effluents from Beaver Valley Power Station, Unit No. 1. For units with shared radwaste treatment systems, the gaseous effluents from the shared system are proportioned among the units sharing that system.

3/4.11.2.2 DOSE, NOBLE GASES

This specification is provided to implement the requirements of Sections II.B, III.A and IV.A of Appendix I, 10 CFR Part 50. The Limiting Condition for Operation implements the guides set forth in Section II.B of Appendix I. The ACTION statements provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive material in gaseous effluents will be kept "as low as is reasonably achievable". The Surveillance Requirements implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data such that the actual exposure of an individual through the appropriate pathways is unlikely to be substantially under-estimated. The dose calculations established in the ODCM for calculating the doses due to the actual release rates of radioactive noble gases in gaseous effluents are consistent with the methodology provided in Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I," Revision 1, October 1977 and Regulatory Guide 1.111, "Methods for Estimating Atmospheric

SITE BOUNDARY FOR GASEOUS AND LIQUID* EFFLUENTS
FOR THE BEAVER VALLEY POWER STATION

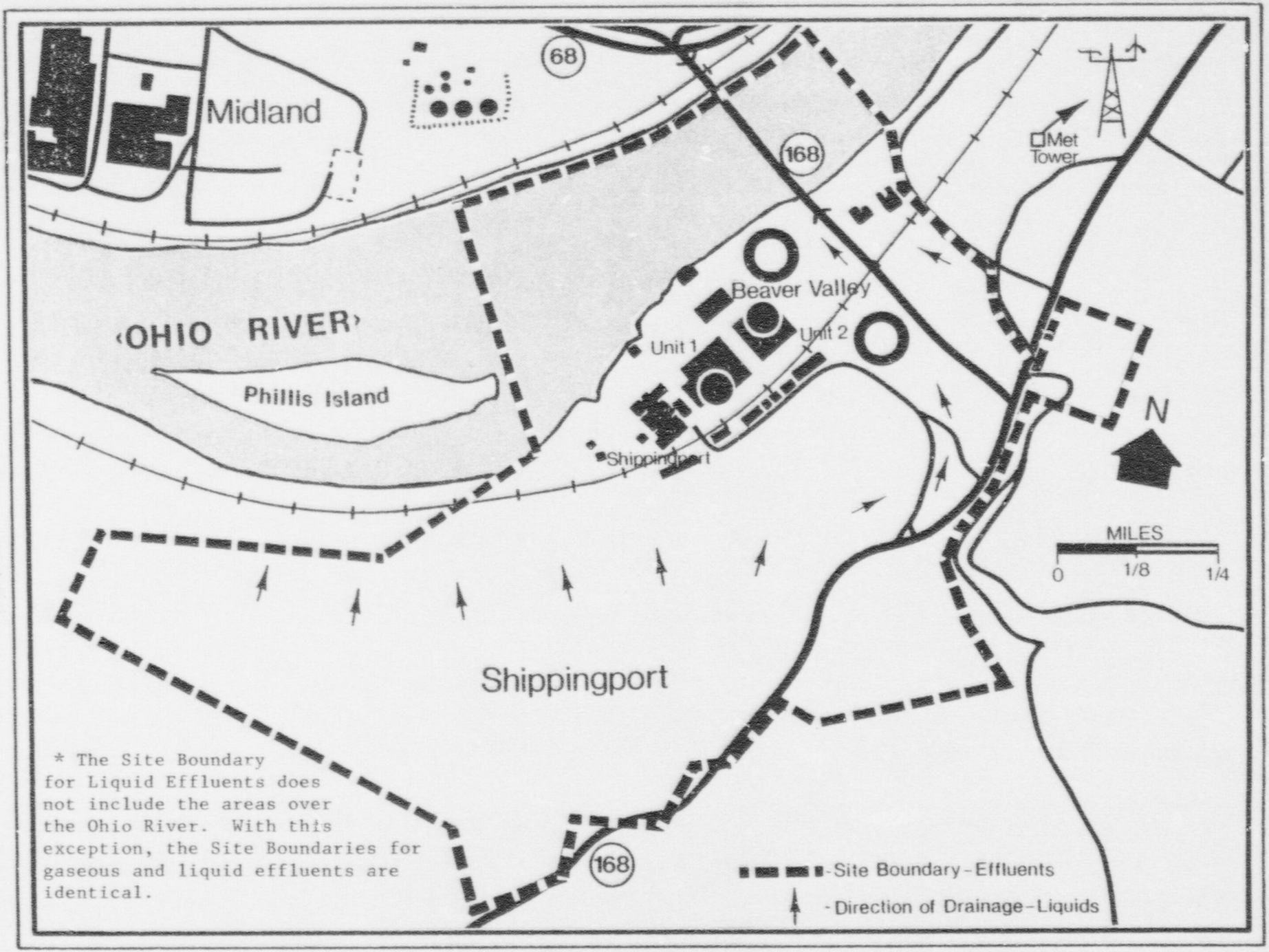

FIGURE 5.1-1

BEAVER VALLEY - UNIT 1 5-1b (next page is 5-1d)
PROPOSED WORDING

ATTACHMENT B

Proposed Technical Specification Change No. 139
Safety Analysis

Description of amendment request: The proposed amendment would revise the radioactive effluent specifications to reflect Draft Revision 5 of the Standard Technical Specifications by addressing effluent requirements applicable to each reactor unit, in accordance with the NRC staff position provided by letter dated May 7, 1987, and would incorporate other changes for additional clarification. The following changes have been incorporated.

1. Page 3/4 11-6, Section 3.11.1.2 has been revised by adding "from each reactor unit", replacing Figure 5.1-2 with 5.1-1 and revising the * note by adding "within 3 miles of the plant discharge (3 miles downstream only)".

2. Page 3/4 11-8, Section 3.11.1.3 has been revised by adding "from each reactor unit", replacing Figure 5.1-2 with 5.1-1, adding surveillance requirement 4.11.1.3.1 from page 3/4 11-9 and adding a note (next page is 3/4 11-10)".

3. Page 3/4 11-9, delete this page since the only requirement, surveillance requirement 4.11.1.3.1 has been moved to page 3/4 11-8.

4. Page 3/4 11-10, replace surveillance requirement 4.11.1.4 with 4.11.1.4.1.

5. Page 3/4 11-11, Section 3.11.2.1 has been revised by adding an * note applicable to the dose rate "During containment purges the dose rate may be averaged over 960 minutes".

6. Page 3/4 11-13, Table 4.11-2 has been revised by removing the note under item C. Ventilation Systems "Release from the inhalation pathway only". This note is not applicable to the sampling and analysis program for radioactive gaseous waste.

7. Page 3/4 11-14, note c has been revised by adding "(from the appropriate ventilation release pathway)". The existing note implies that tritium grab samples are to be taken from all ventilation systems, however, this note is only applicable to that ventilation pathway lined-up to the refueling cavity ventilation exhaust.

8. Page 3/4 11-15, Section 3.11.2.2 has been revised by deleting "in unrestricted areas (See Figure 5.1-1)", adding "from each reactor unit from the site (See Figure 5.1-1)" and surveillance requirement 4.11.2.2 has been replaced with 4.11.2.2.1.

9. Page 3/4 11-16, Section 3.11.2.3 has been revised by adding"from each reactor unit" and replacing surveillance requirement 4.11.2.3 with 4.11.2.3.1.

10. Page 3/4 11-18, Section 3.11.2.4 has been revised by adding "from each reactor unit" and replacing surveillance requirement 4.11.2.4 with 4.11.2.4.1.

11. Page 3/4 11-21, Section 3.11.2.6 Action statements a and b have been revised to reflect the Standard Technical Specifications and replace surveillance requirement 4.11.2.6 with 4.11.2.6.1.

12. Page 3/4 11-23, replace surveillance requirement 4.11.4.1 with 4.11.4.1.1.

13. Page B 3/4 11-3, Bases Section 3/4.11.2.1 has been revised to reflect Draft Revision 5 of the Standard Technical Specifications. The last sentence in the first paragraph has been revised by replacing "an infant via the cow-milk-infant pathway to $\leq$ 1,500 mrem/year for the nearest cow to the plant" with " a child via the inhalation pathway to $\leq$ 1,500 mrem/year".

14. Page 5-1b, Figure 5.1-1 has been revised by changing the title to address liquid effluents. An * note provides clarification of the site boundary for liquid effluents since this is identical to the site boundary for gaseous effluents except for that area over the Ohio river. A note "(next page is 5-1d)" has been added since the next page (5-1c) is being deleted.

15. Page 5-1c, Figure 5.1-2 is being deleted since the site boundary for liquid effluents is being added to Figure 5.1-1.

Moving surveillance requirement 4.11.1.3.1 from page 3/4 11-9 to page 3/4 11-8 and renumbering applicable surveillance requirements are editorial changes to provide consistency throughout the effluent specifications. Replacing "from the site" with "from each reactor unit from the site" in the applicable specifications reflects Draft Revision 5 of the STS and is in accordance with 10 CFR 50 Appendix I. Draft Revision 5 was used as guidance for these specifications since the Radiological Effluent Technical Specifications were not addressed in earlier versions of the Standard Technical Specifications. Replacing reference to Figure 5.1-2 with Figure 5.1-1 in Sections 3.11.1.2 and 3.11.1.3 reflects the change to Figure 5.1-1 which now includes the liquid effluent site boundary. Clarification of the * note in Section 3.11.1.2 is provided to reflect the qualification specified in Draft Revision 5 of the Standard Technical Specifications so that the required Special Report will address the radiological impact on the drinking water sources within 3 miles downstream of the plant. An * note has been added to Section 3.11.2.1 for clarification purposes to specify the time applicable when determining the dose rate for comparison to the limits. The note removed from Table 4.11-2 is not applicable to this

table and is addressed in accordance with the ODCM. Table 4.11-2 note c has been revised to clearly specify that the tritium grab samples are to be taken from the ventilation system in use and that not all ventilation systems must be sampled. Section 3.11.2.6 has been revised to correct the Action statements to provide the correct action requirements when the oxygen concentration exceeds 2% in the waste gas holdup system. Bases Section 3/4.11.2.1 has been corrected to accurately specify that the limiting basis for determining the thyroid dose rate is based on that dose received by a child from the inhalation pathway. Since Figure 5.1-2 is identical to Figure 5.1-1, except for the title, Figure 5.1-2 has been deleted and the title has been revised to identify the site boundary for liquid effluents. Therefore, these changes provide clarification, consistency and improved accuracy to simplify and improve the understanding of the requirements to reflect the STS and do not affect the UFSAR or any regulatory basis.

ATTACHMENT C

No Significant Hazards Evaluation
Proposed Technical Specification Change No. 139

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 changes do not involve a significant hazard consideration because:

1. Moving surveillance requirement 4.11.1.3.1 from page 3/4 11-9 to page 3/4 11-8 and renumbering applicable surveillance requirements are editorial changes to provide consistency throughout the effluent specifications. Replacing "from the site" with "from each reactor unit from the site" in applicable specifications reflects Draft Revision 5 of the STS and is in accordance with 10 CFR Appendix I.

   Draft Revision 5 was used as guidance for these specifications since the Radiological Effluent Technical Specifications were not addressed in earlier versions of the Standard Technical Specifications. Replacing reference to Figure 5.1-2 with Figure 5.1-1 in Sections 3.11.1.2 and 3.11.1.3 reflects the change to Figure 5.1-1 which now includes the liquid effluent site boundary. Clarification of the * note in Section 3.11.1.2 is provided to reflect the qualification specified in Draft Revision 5 of the Standard Technical Specifications so that the required Special Report will address the radiological impact on the drinking water sources within 3 miles downstream of the plant. An * note has been added to Section 3.11.2.1 for clarification purposes to specify the time applicable when determining the dose rate for comparison to the limits. The note removed from Table 4.11-2 is not applicable to this table and is addressed in accordance with the ODCM. Table 4.11-2 note c has been revised to clearly specify that the tritium grab samples are to be taken from the ventilation system in use and that not all ventilation systems must be sampled. Section 3.11.2.6 has been revised to correct the Action statements to provide the correct action requirements when the oxygen concentration exceeds 2% in the waste gas holdup system. Bases Section 3/4.11.2.1

has been corrected to accurately specify that the limiting basis for determining the thyroid dose rate is based on that dose received by a child from the inhalation pathway. Since Figure 5.1-2 is identical to Figure 5.1-1, except for the title, Figure 5.1-2 is has been deleted and the title has been revised to identify the site boundary for liquid effluents. Therefore, these changes are administrative in nature providing clarification, consistency and improved accuracy to simplify and improve the understanding of the requirements and do not affect the probability of occurrence or the consequence of a previously evaluated accident.

2. No change in plant operations or to equipment or components is required. These changes are administrative in nature and will not affect the safe operation of the plant. These changes are consistent with the UFSAR accident analyses and will not create the possibility of a new or different kind of accident from those described in the UFSAR.

3. The changes proposed to correct Bases Section 3/4.11.2.1 will reflect the STS Bases regarding the limiting thyroid dose rate (child) and pathway (inhalation) for gaseous effluents. The changes proposed to specify effluent limits based on unit releases are consistent with the Bases which state that "This specification applies to the release of gaseous effluents from Beaver Valley Power Station, Unit 1". Therefore, these changes are administrative in nature, are consistent with the technical specification bases and the STS and will not reduce the margin of safety of the plant.

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (51 FR 7751) of amendments that are considered not likely to involve significant hazards consideration. Example (i) relates to "A purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature". The proposed change relates to this example in that the proposed changes are requested to provide consistency between various specifications concerning effluent requirements applicable to each reactor unit in accordance with the NRC staff position provided by letter dated May 7, 1987 and provides additional administrative clarification for consistency of current requirements.

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