

Lew W. Myers
Senior Vice President

412-393-5234
Fax: 724-643-8069

April 27, 2000
L-00-058

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

**Subject: Beaver Valley Power Station, Unit No. 2
Docket No. 50-412, License No. NPF-73
Revised Information to Support License Amendment Request No. 149
Snubber Functional Test Surveillance Interval Extension**

This letter provides a revision to the proposed Technical Specification change contained in the Unit 2 License Amendment Request (LAR) 149 submitted by letter L-99-146, dated September 22, 1999. LAR 149 proposed a one-time extension of the Unit 2 surveillance interval for snubber functional testing. The current surveillance interval for this testing expires May 17, 2000. The proposed change would allow the snubber functional testing to be performed during the Unit 2 eighth refueling outage currently scheduled to start in September 2000. The proposed amendment was necessary due to outage schedule changes resulting from the extended Unit shutdown in 1998.

The revised Technical Specification requirement is provided at the request of the NRC. The NRC requested that the proposed footnote providing the surveillance interval extension be revised to more clearly identify the snubber functional testing required to be complete in Modes 5 and 6 after core reload during the eighth refueling outage. The attached markup and final typed page contain the agreed upon Technical Specification wording. As the revised version is more restrictive, it remains consistent with the safety analysis and no significant hazards evaluation previously submitted for LAR 149 by letter L-99-146 dated September 22, 1999.

If there are any questions concerning this matter, please contact Mr. Brian F. Sepelak Supervisor, Licensing at 412-393-5282.

Sincerely,

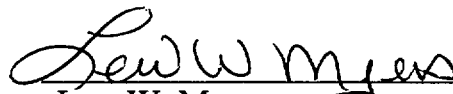


Lew W. Myers

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I, Lew W. Myers, being duly sworn, state that I am Senior Vice President of FirstEnergy Nuclear Operating Company (FENOC), that I am authorized to sign and file this submittal with the Nuclear Regulatory Commission on behalf of FENOC, and that the statements made and the matters set forth herein pertaining to FENOC are true and correct to the best of my knowledge and belief.

FirstEnergy Nuclear Operating Company




Lew W. Myers
Senior Vice President - FENOC

STATE OF PENNSYLVANIA

COUNTY OF BEAVER

Subscribed and sworn to me, a Notary Public, in and for the County and State above named, this 27th day of April, 2000.



My Commission Expires:

Notarial Seal
Sheila M. Fattore, Notary Public
Shippingport Boro, Beaver County
My Commission Expires Sept. 30, 2002
Member, Pennsylvania Association of Notaries

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c: Mr. D. S. Collins, Project Manager
Mr. D. M. Kern, Sr. Resident Inspector
Mr. H. J. Miller, NRC Region I Administrator
Mr. D. A. Allard, Director BRP/DEP
Mr. L. E. Ryan (BRP/DEP)
Ms. M. E. O'Reilly (FirstEnergy Legal Department)

PLANT SYSTEMSSURVEILLANCE REQUIREMENTS (Continued)c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that: (1) the snubber has no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are functional, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage are functional. Snubbers which appear inoperable as a result of the visual inspections shall be classified as unacceptable and may be reclassified acceptable for the purpose of establishing the next visual inspection interval, provided that: (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of type that may be generically susceptible; or (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specification 4.7.12.e or 4.7.12.f, as applicable. All snubbers found connected to an inoperable common hydraulic fluid reservoir shall be counted as unacceptable for determining the next inspection interval. A review and evaluation shall be performed and documented to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the ACTION requirements shall be met.

Snubbers which have been determined to be inoperable as a result of unexpected transients, isolated damage, or other random events, and cannot be proven operable by functional testing for the same reasons, shall not be counted in determining the next visual inspection period when the provision in 4.7.12.d (that failures are subject to an engineering evaluation of component structural integrity) has been met and equipment has been restored to an operable state via repair and/or replacement as necessary.

d. Functional Tests

At least once per 18 months during shutdown, a representative sample (of at least 10%) of the total of each type of snubber in use in the plant shall be functionally tested either in place or in a bench test. For Functional Testing type of snubber shall mean a group or combination of groups by load size and kind (i.e., hydraulic or mechanical) or any other combination of load size and kind. For each snubber that does not meet the functional test acceptance criteria of Specification 4.7.12.e or 4.7.12.f, an additional 10% shall be functionally tested.

****** A one-time extension of the snubber functional test frequency for operating cycle 8 is permitted. This extension is applicable until the first re-entry into MODE 6 following defueled condition during refueling outage (2ROB or November 30, 2000, whichever is earlier,)

SURVEILLANCE REQUIREMENTS (Continued)

c. Visual Inspection Acceptance Criteria

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** A one-time extension of the snubber functional test frequency for operating cycle 8 is permitted. This extension is applicable until the first re-entry into MODE 6 following defueled condition during refueling outage 2R08 or November 30, 2000, whichever is earlier.