

Lew W. Myers
Senior Vice President

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

July 29, 2000
L-00-100

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

**Subject: Beaver Valley Power Station, Unit No. 1 and No. 2
BV-1 Docket No. 50-334, License No. DPR-66
BV-2 Docket No. 50-412, License No. NPF-73
Withdraw License Amendment Request Nos. 220 and 88**

License Amendment Request (LAR) Nos. 220 and 88 were submitted to the NRC by Letter L-99-006 dated January 18, 1999. This LAR would have revised Limiting Safety System Settings (LSSS) 2.2.1 and associated Table 2.2-1, revised Limiting Condition For Operation (LCO) 3.3.2.1 and associated Table 3.3-4, and included revising non-conservative trip setpoints and allowable values. This change would have also defined certain trip setpoints as "nominal values" and removed the inequality sign from the specified trip setpoint. In addition, certain Bases sections would have been revised to reflect changes to LSSS 2.2.1 and LCO 3.3.2.1. Miscellaneous editorial changes to the Technical Specifications and Bases section were also included in this LAR.

For Beaver Valley Power Station (BVPS) Unit No. 1 only, the proposed LAR would have deleted certain references to two-loop plant operation and loop stop valve position including License Condition 2.C.(3). Tables 3.3-3 and 4.3-2 would have also been revised to reflect the deletion of Functional Unit 7.d (Auxiliary Feedwater - Emergency Bus Undervoltage).

Based on discussions with the NRC staff, the subject LAR is not acceptable without changing the proposed Technical Specification Bases wording from "the Limiting Safety System Settings are defined as the Trip Setpoints" to "the Limiting Safety System settings are defined as the Allowable Values." BVPS believes that the current setpoint methodology does not support making this Bases wording change. However, a new setpoint methodology, which BVPS is in the process of adopting, will support this Bases wording change. Therefore, BVPS believes that the most appropriate course of action to resolve the NRC staff's concern with this LAR is to withdraw the subject LAR and replace it with a new LAR based on a setpoint methodology which supports the Limiting Safety System Settings being defined as the Allowable Values.

A001

Beaver Valley Power Station, Unit No. 1 and No. 2
Withdraw License Amendment Request Nos. 220 and 88
L-00-100
Page 2

The current plan is to submit to the NRC a new LAR to address the non-conservative trip setpoints and allowable values contained in the BVPS Technical Specifications and incorporate the new setpoint methodology by December 31, 2000. The non-conservative trip setpoints and allowable values, that were to be resolved by the subject LAR, will continue to remain under BVPS administrative control. This administrative control will remain in place until a technical specification amendment, based on the new LAR, can be NRC approved and implemented at BVPS.

Therefore, FirstEnergy Nuclear Operating Company requests to withdraw LAR No. 220 (Unit 1) and LAR No. 88 (Unit 2) for BVPS.

If there are any questions concerning this matter, please contact Mr. Thomas S. Cosgrove, Manager, Licensing at 724-682-5203.

Sincerely,



Lew W. Myers

- 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)