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L-05-075

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

**Subject: Beaver Valley Power Station, Unit Nos. 1 and 2
BV-1 Docket No. 50-334, License No. DPR-66
BV-2 Docket No. 50-412, License No. NPF-73
Response to NRC Acceptance Review for License Renewal Application**

By letter dated February 9, 2005, the First Energy Nuclear Operating Company (FENOC) submitted its License Renewal Application (LRA) for the Operating License Nos. DPR-66 and NPF-73 for Beaver Valley Power Station Unit Nos. 1 and 2. Subsequently, NRC conducted its acceptance review and issued a letter to FENOC on March 24, 2005, documenting its determination that the LRA was not complete or acceptable for docketing.

The purpose of this letter is to respond to NRC's request for information in the subject letter concerning FENOC's plans for revision and re-submittal of its application for renewal of Operating License Nos. DPR-66 and NPF-73 for Beaver Valley Power Station Unit Nos. 1 and 2.

FENOC has initiated a root cause evaluation of the organizational issues and process factors that contributed to this failure to provide a complete LRA submittal. This includes the use of a turnkey contract and its interface with FENOC license renewal application preparation and approval processes. In addition, we have commenced preparation of assessments of the process guidelines and resultant work products that were used to prepare the LRA. The combination of root cause and technical evaluations will be used to ensure that the scope of the recovery plan for re-submittal of the LRA is appropriate.

FENOC recognizes that the list of deficiencies provided by NRC in the subject letter is not comprehensive or exhaustive, yet is characteristic of the deficiencies contained in the document. Therefore, FENOC will ensure that an extent of condition review is performed to bound the technical aspects of the LRA and its supporting documents that must be corrected, augmented, reformatted or revised. Appropriate corrective actions will be assigned and a recovery plan will be prepared, reviewed, and approved by FENOC management prior to resuming work on the LRA.

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Additionally, FENOC requests an early opportunity to meet and discuss the deficiencies noted. This will help ensure that the quality of the revised LRA and supporting documents will be found sufficient for docketing, review, and eventual approval by NRC. FENOC thanks the NRC staff for their consideration and assistance in supporting a meeting with FENOC management and the license renewal staff.

It is FENOC's intention to correct the deficiencies in the LRA preparation, review and approval process, re-perform any required supporting evaluations or analyses, and to revise, validate and resubmit a complete and sufficient LRA for both BVPS units. FENOC has not yet fully determined the extent of the re-work that will be required for submittal of the revised LRA. FENOC desires to present the recovery plan and proposed submittal schedule to the NRC in a meeting during the later part of May 2005. Following this meeting, FENOC will formally inform NRC of the new submittal date.

No new commitments are contained in this submittal. If you have questions or require additional information, please contact Mr. Henry L. Hegrat, Supervisor - Licensing, at 330-315-6944.

Sincerely,


L. William Pearce

c: Mr. T. G. Colburn, NRR Senior Project Manager
Mr. P. C. Cataldo, NRC Sr. Resident Inspector
Mr. S. J. Collins, NRC Region I Administrator
Mr. D. A. Allard, Director BRP/DEP
Mr. L. E. Ryan (BRP/DEP)