

June 17, 2005

L-05-106

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 Request for Additional Information Regarding
Bulletin 2003-01 (TAC Nos. MB9554 and MB9555)**

References:

1. NRC Bulletin 2003-01, "Potential Impact of Debris Blockage on Emergency Sump Recirculation at PWRs," dated June 9, 2003
2. Response (L-03-117) to Bulletin 2003-01 for Beaver Valley Power Station (BVPS) dated August 8, 2003
3. Response (L-04-083) to Request for Additional Information, dated June 15, 2004

In a letter dated June 15, 2004 (Reference 3) FirstEnergy Nuclear Operating Company (FENOC) provided a response to an NRC Request for Additional Information (RAI) dated May 12, 2004. The RAI was in regard to the FENOC response (Reference 2) to NRC Bulletin 2003-01 (Reference 1). This letter provides a revised response to that RAI.

RAI Item 1 requested FENOC to provide a discussion of the WOG-recommended compensatory measures that had been or would be implemented for BVPS. It also requested a discussion of the evaluations or analyses performed to determine that these compensatory measures were acceptable for BVPS-1 and 2, and technical justification for those WOG-compensatory measures not being implemented. In response, FENOC committed to incorporate guidance of Westinghouse Owners Group (WOG) Candidate Operator Action (COA) A3-W, "Terminate One Train of Safety Injection After Recirculation Alignment" into BVPS-1 and 2 emergency operating procedures.

It has subsequently been determined that implementation of COA A3-W will not be implemented at BVPS-1 or 2. Securing one train of safety injection (SI) creates the possibility of a subsequent single failure interrupting SI flow until the operator can start a standby SI pump. This would increase the likelihood of fuel damage. Assuming fifteen minutes is needed to restart the secured train, a limited scope evaluation predicts that the

A103

interruption would result in a significant increase in fuel clad temperature. The evaluation also shows that it would be necessary to delay securing the SI train for approximately two hours into the event to avoid significant heatup with a single failure of the operating train. At this point in time, securing one SI train would be of limited value in preventing screen blockage, and not justified by the increased risk of losing all SI capability. Implementation of the procedure change would not be consistent with the existing licensing basis and would possibly require a license amendment to allow use of a different LOCA analysis methodology. Therefore, it has been judged that the potential negative impact of increasing the likelihood of core damage outweighs the potential benefit in sump net positive suction head.

No new commitments are contained in this submittal. If there are any questions concerning this matter, please contact Mr. Henry L. Hegrat, Supervisor - Licensing, at 330-315-6944.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 17, 2005.

Sincerely,


For L. William Pearce

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