

August 1, 2005

Mr. L. William Pearce
Vice President
FirstEnergy Nuclear Operating Company
Beaver Valley Power Station
Post Office Box 4
Shippingport, PA 15077

SUBJECT: BEAVER VALLEY POWER STATION, UNIT NOS. 1 AND 2 (BVPS-1 AND 2) -
REQUEST FOR ADDITIONAL INFORMATION (RAI) - STEAM GENERATOR
(SG) LEVEL ALLOWABLE VALUE SETPOINTS (TAC NOS. MC4649 AND
MC4650)

Dear Mr. Pearce:

The Nuclear Regulatory Commission (NRC) staff has reviewed the information provided in your October 5, 2004, license amendment request (LAR) to revise the SG level allowable value setpoints. The NRC staff has determined that the additional information contained in the enclosure to this letter is needed to complete its review. As discussed with your staff, we request your response within 30 days of receipt of this letter, in order for the NRC staff to complete its scheduled review of your LAR. If you have any questions, please contact me at 301-415-1402.

Sincerely,

/RA/

Timothy G. Colburn, Senior Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-334 and 50-412

Enclosure: RAI

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION

BEAVER VALLEY POWER STATION, UNIT NOS. 1 AND 2 (BVPS-1 AND 2)

STEAM GENERATOR (SG) LEVEL ALLOWABLE VALUE (AV) SETPOINTS

METHOD 3 CONCERNS

During reviews of proposed license amendment requests (LARs) that contain changes to limiting safety system settings (LSSSs) setpoints, the Nuclear Regulatory Commission (NRC) staff identified concerns regarding the method used by some licensees to determine the AVs identified in the technical specifications (TSs). AVs are typically identified in the TSs as LSSSs to provide acceptance criteria for determination of instrument channel operability during periodic surveillance testing. The NRC staff's concern relates to one of the three methods for determining the AV as described in the ISA's (Instrument Society of America's) recommended practice, ISA-RP67.04-1994, Part II, "Methodologies for Determination of Setpoints for Nuclear Safety-Related Instrumentation."

The NRC staff has determined that to ensure a plant will operate in accordance with the assumptions upon which the plant safety analyses have been based, additional information is required regardless of the methodology used to establish LSSS values in the TSs. Details about the NRC staff's concerns are available on the NRC's public website under Agencywide Documents Access and Management System (ADAMS) Accession Numbers ML041690604, ML041810346, and ML050670025¹.

In order for the NRC staff to assess the acceptability of your LAR for SG level AV setpoints related to this issue, the NRC staff requests the following additional information:

1. Discuss the setpoint methodology used at BVPS-1 and 2 to establish AVs associated with LSSS setpoints.
2. Regardless of the methodology used, the NRC staff has the following questions regarding the use of the methodology at BVPS-1 and 2:
 - a. Discuss how the methodology and controls you have in place ensure that the analytical limit (AL) associated with an LSSS will not be exceeded (the AL is a surrogate that ensures the safety limits will not be exceeded). Include in your discussion information describing the controls you employ to ensure the trip setpoint established after completing periodic surveillances satisfies your methodology. If the controls are located in a document other than the TSs, discuss how those controls satisfy the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Section 50.36, as they apply to LSSSs.

¹ To access the document, go to www.nrc.gov, click on "Electronic Reading Room," then "Documents in ADAMS," then "Web-Based Access," then "Begin ADAMS Search," then "Advanced Search," and enter the Accession number into the Accession Number box near the top of the page. Click on the "Search" button near the bottom of the page. You will need to select "Image File" on the search results page to view the document. NOTE: You will need Adobe Acrobat Reader to open this file.

The NRC staff requests the licensee discuss current requirements or procedures for returning the as-left instrument settings to settings within the tolerance band for the trip setpoint established to protect the applicable safety limits.

- b. Discuss how the TS surveillances ensure the operability of the instrument channel. This should include a discussion on how the surveillance test results relate to the TS AV and describe how these are used to determine the operability of the instrument channel. If the requirements for determining operability of the LSSS instrument being tested are in a document other than the TSs (e.g., plant test procedure), discuss how this meets the requirements of 10 CFR 50.36 as they relate to LSSSs.

Additionally, the NRC staff requests the licensee's response to include a discussion of the requirements and methods the licensee has in place to assess the operability of tested instrumentation giving consideration to the previous as-left setting and accounting for uncertainties associated with the testing and calibration of the instruments.

In answering the above questions, as part of the discussion on the setpoint methodology used to establish AVs, the NRC staff requests that the licensee discuss consideration of the Technical Specification Task Force (TSTF) traveler being developed on this subject and to what extent the licensee would consider adopting the TSTF when issued.

Beaver Valley Power Station, Unit Nos. 1 and 2

cc:

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