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April 13, 2006
L-06-070

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
Request for Notice of Enforcement Discretion
Loss of Supplemental Leak Collection and Release System Filters**

On April 11, 2006, FirstEnergy Nuclear Operating Company (FENOC) verbally requested a Notice of Enforcement Discretion (NOED) for Beaver Valley Power Station (BVPS) Unit No. 2 because compliance with Technical Specification (TS) 3.0.3 would require a plant shutdown as a result of both trains of Supplemental Leak Collection and Release System (SLCRS) filters becoming inoperable. The inoperability resulted from the filters being inadvertently wetted from a fire protection system deluge. Following the April 11, 2006 teleconference, the Nuclear Regulatory Commission (NRC) verbally approved the NOED request at 1520 hours, allowing enforcement discretion for TS 3.0.3 for 48 hours in order to permit the replacement of one train of SLCRS filters. Following the restoration of one train of SLCRS, the plant will transition back into the Action for Technical Specification 3.7.8.1 for one train of SLCRS being inoperable.

FENOC hereby provides the written response to the NRC Notice of Enforcement Discretion guidance questions that were discussed with the NRC in the teleconference held on April 11, 2006.

The regulatory commitments made during the teleconference and in this submittal are listed in Attachment 2.

If you have questions or require additional information, please contact Mr. Larry R. Freeland, Acting Director, Performance Improvement at 724-682-5206.

Sincerely,



James H. Lash

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Attachments:

- 1. Request for Notice of Enforcement Discretion for Beaver Valley Power Station
Unit No. 2**
- 2. Commitment List**

**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. D. A. Allard, Director BRP/DEP
Mr. L. E. Ryan (BRP/DEP)**

ATTACHMENT 1
TO L-06-070

REQUEST FOR NOTICE OF ENFORCEMENT DISCRETION
Beaver Valley Power Station Unit No. 2
Docket No. 50-412, License No. NPF-73

FirstEnergy Nuclear Operating Company (FENOC) hereby provides the written response to the Nuclear Regulatory Commission (NRC) Notice of Enforcement Discretion (NOED) guidance questions that were discussed in a teleconference held on April 11, 2006. This information is consistent with the information requested in the NRC Regulatory Information Summary 2005-01, Changes to Notice of Enforcement Discretion Process and Staff Guidance, and NRC Inspection Manual Part 9900: Technical Guidance, Operations – Notices of Enforcement Discretion.

1. The Technical Specification (TS) or other license condition that will be violated:

Response: Beaver Valley Power Station Unit No. 2 (BVPS-2) Technical Specification 3.0.3 due to inability to meet Technical Specification 3.7.8.1, Supplemental Leak Collection and Release System (SLCRS) which is applicable in Modes 1-4:

With both trains of SLCRS inoperable, Technical Specification 3.0.3 applies. Technical Specification 3.0.3 states:

When a Limiting Condition for Operation is not met . . . , within one hour action shall be initiated to place the unit in a Mode in which the specification does not apply by placing it, as applicable, in:

1. At least Hot Standby within the next 6 hours,
2. At least Hot Shutdown within the following 6 hours, and
3. At least Cold Shutdown within the subsequent 24 hours.

BVPS-2 requests discretion to violate Technical Specification 3.0.3 to allow BVPS-2 to remain in Mode 1 for 48 hours (from the time the NOED is granted) which will provide sufficient time to replace one train of SLCRS charcoal/HEPA filters. With one train of charcoal/HEPA filters replaced, one train of SLCRS can be declared operable, allowing BVPS-2 to exit Technical Specification 3.0.3 and re-enter Technical Specification 3.7.8.1. Technical Specification 3.7.8.1 Action states "With one SLCRS exhaust air filter train inoperable, restore the inoperable train to operable status within 7 days (from the time the first SLCRS train became inoperable at 0436 on April 10) or be in at least Hot Standby within the next 6 hours and in Cold Shutdown within the following 30 hours.

2. The circumstances surrounding the situation: including likely causes; the need for prompt action; action taken in an attempt to avoid the need for an NOED; and the identification of any relevant historical events.

Response: At 0436 hours on April 10, 2006, the "A" train of SLCRS was put on clearance for scheduled maintenance/testing and declared inoperable. At 0924 hours on April 11, 2006, an inadvertent actuation of the fire protection deluge system occurred, spraying water in several areas within the BVPS-2 plant, including the charcoal and HEPA filters within both trains of the SLCRS system filters. Since wet charcoal/HEPA loses its filtration capacity, the second train ("B" train) of SLCRS was declared inoperable at 0924 hours on April 11, 2006. The affected charcoal/HEPA filters in both trains of the SLCRS filters will need replaced to restore operability. There were no other significant adverse effects on safety related plant equipment and plant areas as a result of being deluged with water from the fire protection system actuation.

3. Information to show that the cause and the proposed path to resolve the situation are understood by the licensee, such that there is a high likelihood that planned actions to resolve the situation can be completed within the proposed NOED time frame.

Response: The cause of this event was an inadvertent fire protection deluge suppression system actuation. Compensatory action for this event will be to isolate the water supply to the fire protection deluge system (which goes to SLCRS) by installing a blank flange until a more definitive cause can be established for the fire protection actuation. Periodic fire watch tours were commenced in the affected areas. The fire protection system detection equipment and fire hoses remained available to mitigate any potential fires; the water deluge suppression system is isolated to the SLCRS and other affected areas.

Charcoal and HEPA filters are available on site to be used to replace the wet charcoal/HEPA in one train of SLCRS. The wet charcoal and HEPA filters can be replaced in one SLCRS train, required testing completed, and the train returned to operable status within the requested discretion time frame of 48 hours.

4. The safety basis for the request, including an evaluation of the safety significance and potential consequences of the proposed course of action. The following information should be provided in support of this evaluation. To the extent practicable, the licensee should address the quantitative and qualitative aspects noted below. The numerical guidance for acceptance was established to augment qualitative arguments that the continued operation

of the plant during the period of enforcement discretion will not cause risk to exceed the level determined acceptable during normal work controls and, therefore, there is no net increase in radiological risk to the public.

Response: The BVPS-2 SLCRS is not currently credited in the Probability Risk Assessment (PRA) for either its ventilation or filtration safety functions. The ventilation function supports the High Head Safety Injection (HHSI)/charging pumps operation, which are required for core damage mitigation, while the filtration function supports the dose release mitigation function.

Following a postulated loss of the SLCRS ventilation function, the charging pump cubicles were predicted to have room temperatures exceeding the equipment qualification limits. So additional evaluations were performed to determine if the equipment located within the areas would remain functional during the periods that they would be required to operate in order to mitigate core damage or containment failure. To resolve this issue, calculation 10080-MT-285 was developed to determine the charging pump cubicle heatup rate for a 24-hour period following a complete loss of ventilation based on the Design Basis Accident (DBA) heat load corresponding to pump runout conditions by using existing Unit 2 Charging Pump Cubicle ventilation calculations (10080-MT-271 and 10080-MT-266) as the basis. It also determined whether the HHSI/charging pumps could remain functional for this 24-hour period without ventilation, following operation for its 40 year Equipment Qualification (EQ) life and an additional one month of post DBA operation at runout conditions with ventilation.

The results of 10080-MT-285 show that all of the calculated ambient room temperatures are less than the maximum allowed ambient room temperature of 282.2°F for pump operation. Based on this, it was concluded that the HHSI/charging pumps would continue to operate for a 24-hour period following a complete loss of all ventilation. Therefore, for PRA modeling purposes, the SLCRS ventilation function is not required for supporting the HHSI/charging pumps and was dismissed from further consideration from the PRA model.

Additionally, if the SLCRS repair efforts result in the loss of the ventilation heat removal function for longer than the analyzed 24-hour period, the auxiliary building emergency exhaust fans (2HVP-FN264A/B) can provide sufficient room cooling to the charging pump cubicles to maintain the ambient room temperatures below the maximum allowed ambient room temperature of

282.2°F for pump operation, based on an assessment of calculation 12241-B-2A at DBA conditions.

The SLCRS filtration function is not credited for mitigating any radiation release from containment bypass LOCAs (V-sequence). The V-sequence events can involve core degradation over a wide range of RCS pressures from high to low depending on the size of the break. Core degradation at high pressure tends to yield higher initial RCS retention of radionuclides than at low pressure because of increased residence time, but late reevaporization of retained radionuclides in the Reactor Coolant System (RCS) tends to reduce this effect. The V-sequences, even at low RCS pressures (approaching atmospheric for large breaks), tend to exhibit substantial additional fluid system retention (at least initially) because of the long interfacing fluid system flowpath extending beyond the RCS. Flooded V-sequences, or V-sequences into a large and confining secondary structure, will typically involve a decontamination factor (DF) in the range of 2-10, without crediting SLCRS filtration. In the current BVPS-2 PRA model the V-sequence secondary structure DFs used 4.3, with the source term equal to the average of the listed V-sequence source terms, including BMI-2104, Volumes V and VIII, and Draft NUREG-0956 Bin 11. Therefore, only the building flooding was credited for the V-sequence filtration and not the SLCRS filtration.

Based on the above, there is no incremental conditional core damage probability (CDP) or large early release probability (LERP) due to the SLCRS being inoperable.

- a. Use the zero maintenance PRA model to establish the plant's baseline risk and the estimated risk increase associated with the period of enforcement discretion. For the plant-specific configuration the plant intends to operate in during the period of enforcement discretion, the incremental conditional core damage probability (ICCDP) and incremental conditional large early release probability (ICLERP) should be quantified and compared with guidance thresholds of less than or equal to an ICCDP of $5E-7$ and an ICLERP of $5E-8$. These numerical guidance values are not pass-fail criteria.

Response: The plant operating risk is assessed using Safety Monitor. During the 48-hour NOED discretion period, the plant-specific configuration would result in an incremental conditional core damage probability (ICCDP) of $5.5E-10$, and meets the NOED threshold guidance value of less than $5.0E-07$. This increase

in risk is due primarily to the swing HHSI/charging pump (2CHS-P21C) and containment instrument air compressor (2IAC-C21A) being out of service.

The Safety Monitor does not have the capability to assess large early release risk. However, since the plant-specific configuration ICCDP is $5.5E-10$, the incremental conditional large early release probability (ICLERP) is also expected to be below the NOED threshold guidance value of less than $5.0E-08$.

During the April 11 teleconference, FENOC stated that no other safety related Technical Specification equipment will be intentionally removed from service for surveillances or maintenance activities unless necessary for continued safe operation during this discretion period. In addition, it was subsequently determined to also not intentionally remove any PRA/safety monitor modeled plant equipment required for core damage or large early release mitigation from service unless necessary for continued safe operation during this discretion period. Furthermore, the compensatory action to isolate the fire protection deluge system (which goes to the SLCRS) to ensure that no other inadvertent spray actuations take place will not contribute to the incremental conditional CDP or LERP since the deluge system is not credited in the current fire PRA model.

- b. Discuss the dominant risk contributors (cut sets/sequences) and summarize the risk insights for the plant-specific configuration the plant intends to operate in during the period of enforcement discretion. This discussion should focus primarily on risk contributors that have changed (increased or decreased) from the baseline model as a result of the degraded condition and resultant compensatory measures, if any.

Response: The dominant risk contributors, while in the NOED configuration, are losses of an emergency AC bus with failures of the opposite bus and the electric power cross-tie, excessive feedwater events with failure of auxiliary feedwater and feed & bleed cooling, seismic events involving the collapses of the intake structure or primary auxiliary building, and control room fires. These dominant risk contributors are associated with the planned maintenance activities that existed prior to SLCRS becoming inoperable. Since SLCRS is not currently modeled in the PRA for its ventilation or filtration safety functions, the inoperability of SLCRS will not impact these dominant risk contributors.

- c. Explain compensatory measures that will be taken to reduce the risk associated with the specified configuration. Compensatory measures to reduce plant vulnerabilities

should focus on both event mitigation and initiating event likelihood. The objectives are to:

- i. reduce the likelihood of initiating events;
- ii. reduce the likelihood of unavailability of trains redundant to the equipment that is out-of-service during the period of enforcement discretion;
- iii. increase the likelihood of successful operator recovery actions in response to initiating events.

Response: In addition to SLCRS being inoperable, the current plant configuration has the swing HHSI/charging pump (2CHS-P21C) and containment instrument air compressor (2IAC-C21A) being out of service, for which operability is not required by BVPS-2 Technical Specifications. This configuration results in acceptable risk levels. As compensatory actions, no other safety related Technical Specification or PRA/safety monitor modeled equipment will be intentionally removed from service for surveillances or maintenance activities during this discretion period. Additionally, no discretionary switchyard activities will be allowed during the NOED time period. Compensatory actions were also taken to isolate the fire protection deluge system water supply to the affected plant areas. Periodic fire watch tours are in place during the time frame that the fire protection deluge system is isolated.

- d. Discuss how the proposed compensatory measures are accounted for in the PRA. These modeled compensatory measures should be correlated, as applicable, to the dominant PRA sequences identified in item b. above. In addition, other measures not directly related to the equipment out-of-service may also be implemented to reduce overall plant risk and, as such, should be explained. Compensatory measures that cannot be modeled in the PRA should be assessed qualitatively.

Response: The PRA model configuration risk during the period that this NOED is in effect assumes that no other safety related Technical Specification or PRA/safety monitor modeled plant equipment is taken out of service. The additional compensatory actions will ensure that a reliable offsite power source is maintained and that fires will be detected in an expeditious manner, so initiating event frequencies remain unchanged in the PRA model.

- e. Discuss the extent of condition of the failed or unavailable component(s) to other trains/divisions of equipment and what adjustments, if any, to the related PRA common cause factors have been made to account for potential increases in their failure probabilities. The method used to determine the extent of condition should

be discussed. It is recognized that a formal root cause or apparent cause is not required given the limited time available in determining acceptability of a proposed NOED. However, a discussion of the likely cause should be provided with an associated discussion of the potential for common cause failure.

Response: Both trains of the SLCRS filter banks were impacted by the inadvertent fire water actuation; no other Technical Specification required plant equipment was adversely affected. With the compensatory action to isolate the fire protection deluge system, additional inadvertent actuations are not expected to occur. As such, there is no impact on the PRA common cause factors associated with this event. The cause of the inadvertent fire protection system actuation is not known at this time.

- f. Discuss external event risk for the specified plant configuration. An example of external event risk is a situation where a reactor core isolation cooling (RCIC) pump has failed and a review of the licensee's Individual Plant Examination of External Events or full-scope PRA model identifies that the RCIC pump is used to mitigate certain fire scenarios. Action may be taken to reduce fire ignition frequency in the affected areas or reduce human error associated with time-critical operator actions in response to such scenarios.

Response: The plant configuration risk assessed using Safety Monitor in response to item 4.a., above, includes the risk from both internal and external events. The dominant contributors to external event risk while in the NOED are not impacted by the unavailability of SLCRS or the components out of service for planned maintenance.

- g. Discuss forecasted weather conditions for the NOED period and any plant vulnerabilities related to weather conditions.

Response: The forecasted weather conditions for the NOED period are partly cloudy ranging to mainly cloudy with a possible thunder-storm. No plant vulnerabilities are expected for these conditions.

5. The justification for the duration of the noncompliance:

Response: Forty-eight hours will be required to replace one train of SLCRS charcoal/HEPA filters, allowing one train of SLCRS to be declared operable. This is based upon an estimated 32 hours to replace the degraded charcoal/HEPA filters with another 16 hours to complete post-maintenance

testing and administrative actions necessary to declare the one train of SLCRS operable. The NOED will end when one train of SLCRS is declared operable or following 48 hours from the approval of the NOED request. Once one train of SLCRS is declared operable, then Technical Specification 3.7.8.1 Action will allow 7 days to restore the second train of SLCRS from when the "A" train of SLCRS was first taken out of service at 0436 hours on April 10, 2006.

6. The condition and operational status of the plant (including safety-related equipment out of service or otherwise inoperable):

Response: Although both trains of SLCRS are inoperable due to wet charcoal and HEPA filters, sufficient heat removal air flow capability remains available and would be able to perform the only currently credited safety function for area heat removal.

The following is a list of Technical Specification components that are currently inoperable or out of service:

- RCS Hot Let Inside Containment Sample Isolation Valve is de-activated closed pursuant to TS 3.6.3.
- Main Steam Line B Drain to Condenser Containment Isolation Valve is de-activated closed pursuant to TS 3.6.3.
- "C" Charging Pump [Note: BVPS-2 Technical Specifications require that only two charging pumps be operable in Mode 1, which is currently being met by the "A" and "B" charging pump. The "C" charging pump is a swing pump which is currently undergoing maintenance with no Technical Specification requirement for its return.]

No Technical Specifications Actions, other than Technical Specification 3.0.3, are currently applicable.

The plant was decreasing power from 100 percent reactor power with power at approximately 40 percent at the start of the teleconference at 1400 hours on April 11, 2006. Power was approximately 20 percent when the NOED was verbally granted at 1520 hours on April 11, 2006.

7. The status and potential challenges to off-site and on-site power sources:

Response: There are no known challenges to the off-site power grid or on-site power sources as determined prior to the NOED request and as reconfirmed with the

FirstEnergy load dispatcher at 1535 hours on April 11, 2006. There were also no adverse effects to off-site and on-site power due to this event.

Access to the BVPS switchyard will be restricted, allowing only required actions necessary for continued safe operation.

8. The basis for the licensee's conclusion that the noncompliance will not be of potential detriment to the public health and safety:

Response: Prior BVPS-2 licensing basis credited SLCRS filtration for Design Bases Accidents for Loss Of Coolant Accident (LOCA), Control Rod Ejection Accident (CREA), and Fuel Handling Accident (FHA).

BVPS-2 License Amendment 121 issued on August 30, 2001, no longer credited SLCRS charcoal/HEPA filters for FHA after a decay period of 100 hours. [It is noted that current BVPS-2 Technical Specification 3.9.3 continues to require that the reactor shall be subcritical for at least 100 hours prior to moving any irradiated fuel assemblies in the reactor vessel, effectively prohibiting a FHA with a decay period of less than 100 hours.] BVPS-2 License Amendment 139 issued on September 10, 2003, for Selective Implementation of Alternative Source Term and Control Room Habitability no longer credited SLCRS charcoal/HEPA filters for filtration following LOCA and CREA. Thus, the need for SLCRS filters was completely removed from the licensing bases safety analyses. However, the elimination of the Technical Specification requirements for SLCRS filtration during Modes 1-4 was not scheduled to be completed until later in order to coordinate this removal with a subsequent license amendment request involving the conversion to the Improved Standard Technical Specifications.

The SLCRS function for area heat removal (for areas serviced by SLCRS) remains the only function credited in safety analyses. Sufficient heat removal air flow remains available from emergency exhaust fans powered from a 1E source which would be able to perform this safety function. Thus, the current lack of functional SLCRS charcoal/HEPA filters will not invalidate any current BVPS-2 safety analyses.

The following compensatory actions will be implemented during the time that the NOED is applicable, if approved:

- 1) isolate the water supply to the fire protection deluge system (which goes to the SLCRS) by installing a blank flange,
 - 2) restrict access to the BVPS switchyard, allowing only required actions necessary for continued safe operation,
 - 3) no planned work or surveillances on BVPS-2 safety related Technical Specification or PRA/safety monitor modeled equipment unless necessary for continued safe operation, and
 - 4) restore both trains of BVPS-2 SLCRS to operable as promptly as reasonably possible.
9. The basis for the licensee's conclusion that the noncompliance will not involve adverse consequences to the environment:

Response: Although both trains of SLCRS are inoperable due to wet charcoal and HEPA filters, BVPS-2 License Amendments 121 and 139 previously removed any design basis accident credit for SLCRS filtration in Modes 1-4. The SLCRS function for area heat removal remains the only function credited in current BVPS-2 safety analyses. Sufficient heat removal air flow remains available from emergency exhaust fans powered from a 1E source which would be able to perform this safety function in its current condition. Thus, the current lack of functional SLCRS charcoal/HEPA filters will not invalidate any current BVPS-2 safety analyses.

In addition BVPS-2 License Amendment Request (LAR) 169, Improved Standard Technical Specification Conversion, submitted in February 2005 proposes that the current SLCRS Technical Specification requirements be removed when the plant is operating in Modes 1-4. BVPS-2 LAR 169 was developed based upon BVPS-2 License Amendments 121/139 which were already implemented prior to BVPS-2 LAR 169. Safety analyses supporting BVPS-2 LAR 173 (Extended Power Uprate - EPU), which is also scheduled to be implemented prior to LAR 169, continues to not credit the SLCRS. The draft Safety Evaluation Report for BVPS-2 LAR 173 issued April 2006 states "The licensee found that BVPS Unit 1 and Unit 2 SLCRS are capable of achieving design and licensing requirements for operation at EPU conditions, including operation in conjunction with an atmospheric containment design, either with or without charcoal/HEPA filters installed in the filtration assemblies. The staff finds this acceptable." Thus, the current and post-EPU licensing basis does not credit SLCRS filtration.

10. A statement that the request has been approved by the facility organization that normally reviews safety issues (Plant On-site Review Committee, or its equivalent):

Response: This NOED request was approved by the BVPS Plant Operations Review Committee (PORC) on April 11, 2006.

11. The request must specifically address which of the NOED criteria for appropriate plant conditions specified in Section B is satisfied and how it is satisfied:

Response: This NOED is requested in order to avoid unnecessary transients as a result of compliance with the Technical Specification 3.0.3 for BVPS-2 in Mode 1, and thus, minimize potential safety consequences and operational risks, pursuant to NRC Inspection Manual, Part 9900: Technical Guidance, Operations – Notices of Enforcement Discretion, Section B, Part 2.1.1.a.

12. Unless otherwise agreed as discussed in Section B, a commitment is required from the licensee that the written NOED request will be submitted within 2 working days and the follow-up amendment will be submitted within 4 working days of verbally granting the NOED. The licensee's amendment request must describe and justify the exigent circumstances (see 10 CFR 50.91(a)(6)). The licensee should state if staff has agreed during the teleconference that a follow-up amendment is not needed. If the licensee intends to propose a temporary amendment, the licensee's amendment request shall include justification for the temporary nature of the requested amendment:

Response: BVPS-2 License Amendment Request (LAR) 169, submitted February 2005, removes the current SLCRS Technical Specification and replaces it with a similar Technical Specification which is only applicable during movement of recently irradiated fuel. There would be no applicability during Mode 1-4 operation. If BVPS-2 LAR 169 were approved, BVPS-2 would not be in violation of any Technical Specification requirement in its current condition.

A written NOED request will be submitted within 2 working days.

The staff agreed during the April 11, 2006 teleconference that an additional LAR is not needed, given that BVPS-2 LAR 169 is already submitted.

13. In addition to items 1-12 above, for severe weather NOED request, the licensee must provide the following information:

- a) The name, organization and telephone number of the official in the government or independent entity who made the emergency situation determination. If deemed necessary, the staff may contact the appropriate official to independently verify the information provided by the licensee prior to making an NOED determination.
- b) Details of the basis and nature of the emergency situation including, but not limited to, its effect on:
 - i. on-site and off-site emergency preparedness;
 - ii. plant and site ingress and egress;
 - iii. off-site and on-site power sources;
 - iv. grid stability; and
 - v. actions taken to avert and/or alleviate the emergency situation (e.g., coordinating with other utilities and the load dispatcher organization for buying additional power or for cycling load, or shedding interruptible industrial or non-emergency loads).
- c) Potential consequences of compliance with existing license requirements (e.g., plant trip, controlled shutdown).
- d) The impact of the emergency situation on plant safety including the capability of the ultimate heat sink.
- e) Potential adverse effects on public health and safety from enforcing compliance with specific license requirements during the emergency situation.

Response: This NOED is not related to severe weather.

ATTACHMENT 2 to L-06-070

Commitment List

The following list identifies those actions committed to by FirstEnergy Nuclear Operating Company (FENOC) for Beaver Valley Power Station (BVPS) Unit No. 2 in this document. Any other actions discussed in the submittal represent intended or planned actions by FENOC. They are described only as information and are not regulatory commitments. Please notify Mr. Larry R. Freeland, Acting Director, Performance Improvement at (724) 682-5206 of any questions regarding this document or associated regulatory commitments.

<u>Commitment</u>	<u>Due Date</u>
1. Isolate the water supply to the fire protection deluge system (which goes to the SLCRS) by installing a blank flange.	While the NOED is in effect
2. Restrict access to the BVPS switchyard, allowing only required actions necessary for continued safe operation.	While the NOED is in effect
3. No planned work or surveillances on BVPS-2 safety related Technical Specification or PRA/safety monitor modeled equipment unless necessary for continued safe operation.	While the NOED is in effect
4. Restore both trains of BVPS-2 SLCRS to operable as promptly as reasonably possible.	While the NOED is in effect