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August 22, 2006 L-06-133

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 Supplement to License Amendment Request Nos. 325 and 195 Control Room Habitability Systems

By letter dated February 17, 2005 (Reference 1), the FirstEnergy Nuclear Operating Company (FENOC) submitted License Amendment Request (LAR) Nos. 325 and 195 that would revise the control room habitability systems Technical Specifications (TS) for Beaver Valley Power Station (BVPS) Unit Nos. 1 and 2. In subsequent telephone conversations on August 3 and August 7, 2006, the NRC staff expressed a desire for alternate wording in the proposed TS regarding in-place testing of the BVPS Unit No. 2 control room emergency ventilation system. An additional change to add the term "recently," with respect to movement of fuel over recently irradiated fuel, to the introductory paragraph for proposed BVPS Unit No. 1 Actions 3.7.7.b.1 and 3.7.7.b.2 is proposed to ensure consistency between the "APPLICABILITY" and "ACTION"

These changes are provided in Attachment A, in the form of markups to the TS originally proposed by Reference 1. The proposed requirements of the original amendment application are unchanged, and the conclusions of the safety analysis and the No Significant Hazards Consideration are unaffected.

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Gregory A. Dunn, Manager FENOC Fleet Licensing at (330) 315-7243.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on August 22, 2006.

Sincerely,

Lack

James H. Lash

Attachments

A. Revisions to Proposed Unit Nos. 1 and 2 Technical Specifications

References:

- Beaver Valley Unit Nos. 1 and 2 License Amendment Request Nos. 325 and 195 Control Room Habitability Systems, FENOC letter L-05-015, dated February 17, 2005.
- 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 A

Revisions to Proposed Unit Nos. 1 and 2 Technical Specifications

License Amendment Request Nos. 325 and 195

PLANT SYSTEMS

3/4.7.7 CONTROL ROOM EMERGENCY VENTILATION SYSTEMS (CREVS)

LIMITING CONDITION FOR OPERATION

3.7.7 Two CREVS trains shall be OPERABLE*:

The control room boundary may be opened intermittently under administrative control.

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<u>APPLICABILITY</u>: MODES 1, 2, 3 and 4, and

During movement of recently irradiated fuel assemblies, and

During movement of fuel assemblies over recently irradiated fuel assemblies.

ACTION:

MODES 1, 2, 3 and 4:

- a.1 With one required CREVS train inoperable, restore the CREVS train to OPERABLE status within 7 days or be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- With two required CREVS trains inoperable due to an a.2 inoperable control room boundary, restore the control room boundary to OPERABLE status within 24 hours or be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- With two required CREVS trains inoperable for reasons other a.3 than described in ACTION a.2, enter Specification 3.0.3 immediately.

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Emergency power for only one CREVS train is required in MODES 5, 6 and with no fuel assemblies in the reactor pressure vessel.

PLANT_SYSTEMS

LIMITING CONDITION FOR OPERATION (continued)

During movement of recently irradiated fuel assemblies and during movement of fuel assemblies over <u>recently</u> irradiated fuel | assemblies:

- b.1 With one required CREVS train inoperable, restore the CREVS train to OPERABLE within 7 days, or immediately place the OPERABLE CREVS train in the emergency pressurization mode of operation, or immediately suspend movement of recently irradiated fuel assemblies and movement of fuel assemblies over recently irradiated fuel assemblies.
- b.2 With two required CREVS trains inoperable, immediately suspend movement of recently irradiated fuel assemblies and movement of fuel assemblies over recently irradiated fuel assemblies.

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LIMITING CONDITION FOR OPERATION (continued)

ACTION (Continued)

During movement of recently irradiated fuel assemblies and during movement of fuel assemblies over recently irradiated fuel assemblies:

- b.1 With one required CREVS train inoperable, restore the CREVS train to OPERABLE status within 7 days, or immediately place the OPERABLE CREVS train in the emergency pressurization mode of operation, or immediately suspend movement of recently irradiated fuel assemblies and movement of fuel assemblies over recently irradiated fuel assemblies.
- b.2 With two required CREVS trains inoperable, immediately suspend movement of recently irradiated fuel assemblies and movement of fuel assemblies over recently irradiated fuel assemblies.

SURVEILLANCE REQUIREMENTS

- 4.7.7.1 The CREVS shall be demonstrated OPERABLE:
 - a. Deleted.
 - b. At least once per 31 days by verifying that each CREVS train operates for ≥ 15 minutes with the heaters in operation.
 - c. At least once per 18 months or (1) after each complete or partial replacement of a HEPA filter or charcoal adsorber bank, or (2) after any structural maintenance on the HEPA filter or charcoal adsorber housings by:
 - 1. Verifying that the charcoal adsorbers remove ≥ 99.95% of a halogenated-hydrocarbon refrigerant test gas when they are satisfies the in-place penetration and by pass leakage testing acceptance criteria of less than 0.05% when tested in-place in accordance with ANSI N510-1980 while operating the pressurization filtration system CREVS train at a flow rate of 800 to 1000 cfm.
 - 2. Verifying that the HEPA filter banks remove ≥ 99.95% of the DOP when they are satisfies the in-place penetration and by-pass leakage testing acceptance criteria of less than 0.05% when tested in-place in accordance with ANSI N510-1980 while operating the pressurization-filtration system <u>CREVS train</u> at a flow rate of 800 to 1000 cfm.
 - 3. Verifying a system flow rate of 800 to 1000 cfm during operation of each CREVS train.

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