

Richard G. Mende
Director, Site Operations

724-682-7773

September 1, 2006
L-06-137

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
Partial Withdrawal of Beyond Scope Issue (BSI)-26 Contained in
License Amendment Request Nos. 296 and 169, Improved Standard
Technical Specification Conversion**

This letter provides updated pages reflecting the partial withdrawal of BSI-26 contained in the FirstEnergy Nuclear Operating Company (FENOC) License Amendment Request (LAR) Nos. 296 and 169 to convert the Beaver Valley Power Station (BVPS) Unit Nos. 1 and 2 Technical Specifications to the Improved Technical Specifications (ITS) for Westinghouse Plants, NUREG-1431. The BVPS ITS conversion LAR was originally submitted by FENOC letter L-05-027 dated February 25, 2005.

The purpose of this letter is to update the BVPS ITS conversion documentation contained in LAR Nos. 296 and 169 (ITS conversion) with revised pages to reflect the partial withdrawal of BSI-26. BSI-26 modified the Auxiliary Feedwater (AFW) System Technical Specification Actions for inoperable AFW train(s). The revised ITS conversion pages contained in Attachment 1 address the Staff concerns regarding the Actions for three inoperable AFW trains and are the result of previous discussions with the Staff in August 2006. As the requested changes result in the deletion of text, Attachment 1 also contains notes describing the changes to the affected pages in more detail.

The information provided with this submittal does not change the evaluations or conclusions of the No Significant Hazards Consideration provided with the ITS conversion LAR. No new regulatory commitments are contained in this submittal. 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.

A001

Beaver Valley Power Station, Unit Nos. 1 and 2
Partial Withdrawal of Beyond Scope Issue (BSI)-26 Contained in
License Amendment Request Nos. 296 and 169,
Improved Standard Technical Specification Conversion
L-06-137
Page 2

I declare under penalty of perjury that the foregoing is true and correct. Executed on
September 1, 2006.

Sincerely,



Richard G. Mende

Attachments:

1. BVPS ITS Conversion (LARs 296 and 169) Revised Pages Reflecting The Partial
Withdrawal of BSI-26.

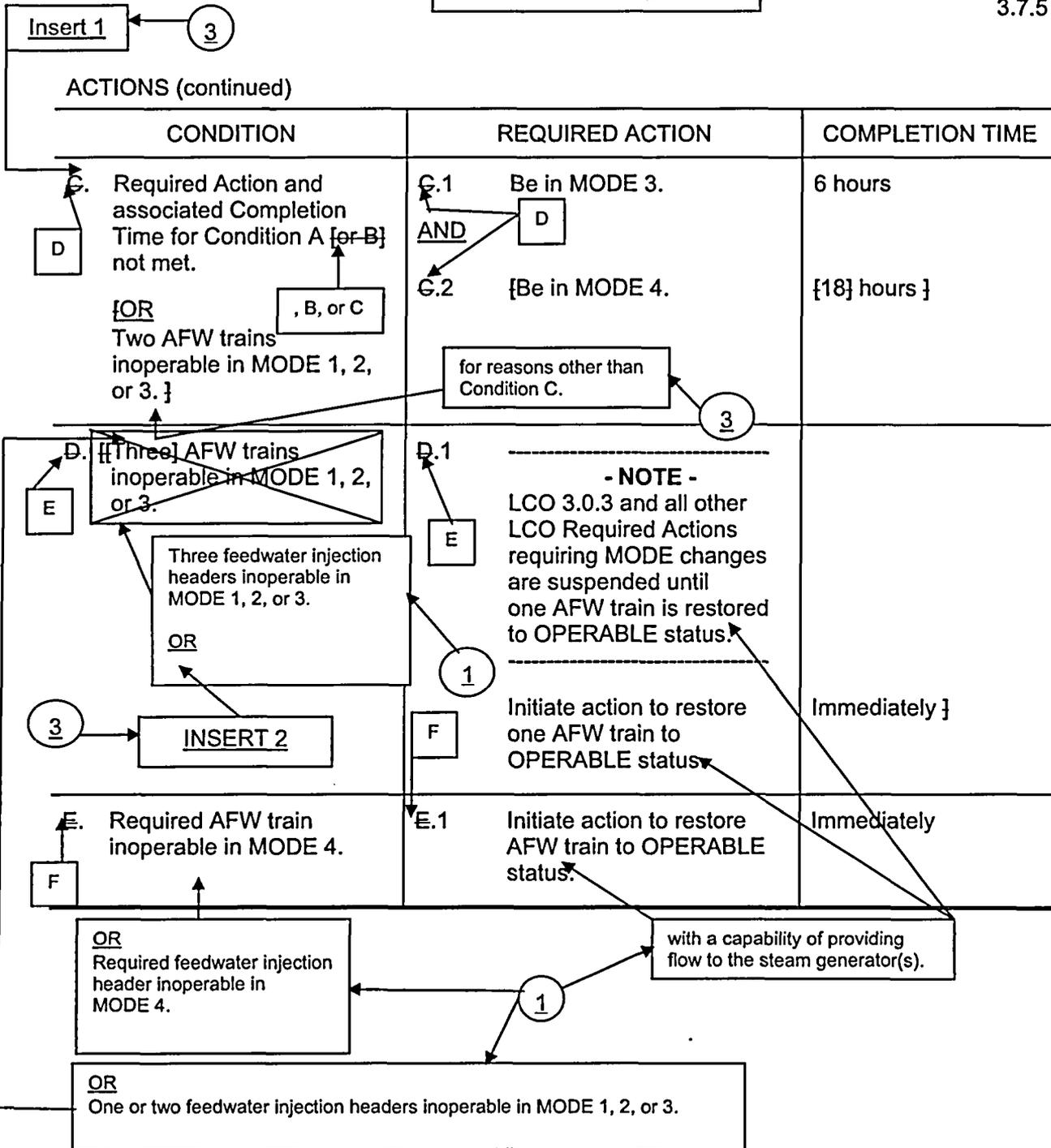
- c: Mr. T. G. Colburn, NRR Senior Project Manager (2 hardcopies)
Mr. P. C. Cataldo, NRC Senior Resident Inspector
Mr. S. J. Collins, NRC Region I Administrator
Mr. D. A. Allard, Director BRP/DEP
Mr. L. E. Ryan (BRP/DEP)

ATTACHMENT 1

BVPS UNITS 1 & 2 ITS CONVERSION LICENSE AMENDMENT REQUEST (LAR) Nos. 296 (UNIT 1) & 169 (UNIT 2) PARTIAL WITHDRAWAL OF BSI-26 CHANGE NOTES

(Page numbers referenced are from bottom right hand corner of page)

1. Page 17 is a page from NUREG-1431 (the standard Technical Specifications (TS) for Westinghouse plants) marked-up to show changes proposed by Beaver Valley Power Station (BVPS). On Page 17 Action Condition D was modified to delete an insert of a proposed new condition (for 3 inoperable AFW trains) and a note which made the proposed condition for 3 inoperable Auxiliary Feedwater (AFW) Trains only applicable when the turbine-driven AFW train was inoperable solely due to one inoperable steam supply line. The deletion of the proposed condition for 3 inoperable AFW Trains and modifying note from Action Condition D eliminates the action to place the affected unit in Mode 4 relying on the turbine-driven AFW pump with a single operable steam supply. In addition, the deletion of the proposed new condition for 3 inoperable AFW trains results in the Actions of the AFW Improved Technical Specification (ITS) being more consistent with the current BVPS TS.
2. Page 20 contains inserts for the proposed BVPS AFW ITS. On page 20, Insert 2 (intended for AFW Action Condition E on page 17) is revised to delete a proposed note that modified Action Condition E. The proposed note modified the standard Action Condition for 3 inoperable AFW Trains such that the condition was only applicable when the turbine-driven AFW train was inoperable for reasons other than one inoperable steam supply line. The deletion of the proposed note from Action Condition E results in the condition for 3 inoperable AFW Trains being applicable when the turbine-driven AFW Train is inoperable for any reason. Action Condition E requires the affected unit to restore one train of AFW to operable status prior to taking any action to place the unit in Mode 4. In addition, the deletion of the proposed note modifying Action Condition E results in the Actions of the proposed BVPS AFW ITS being more consistent with the current BVPS TS.
3. The AFW ITS Bases pages 106 and 107 are modified to delete the inserted text describing the proposed Action Condition for 3 inoperable AFW Trains and associated notes described in Items 1 and 2 above.
4. The current BVPS TS page 223 and associated insert page 225 were revised to show the deletion of the proposed AFW Action Condition and associated notes described in Items 1 and 2 above. This includes the deletion of Inserts 3 and 4 on page 225.
5. Pages 274 and 275 contain discussions of changes (DOCs) for the changes made to the current BVPS AFW TS. These pages were revised to delete DOC M.1 which discussed the proposed changes (Items 1 and 2 above) that were deleted from the BVPS ITS conversion documentation.



Rev. 4, Change 2

BASES

ACTIONS (continued)

for an inoperable turbine-driven AFW pump in MODE 3

dictates that both Completion Times apply simultaneously, and the more restrictive must be met.

Condition A is modified by a Note which limits the applicability of the Condition to when the unit has not entered MODE 2 following a refueling. Condition A allows one AFW train to be inoperable for 7 days vice the 72 hour Completion Time in Condition B. This longer Completion Time is based on the reduced decay heat following refueling and prior to the reactor being critical.]

Required Action B.1 is modified by a Note indicating that the Required Action is only applicable if both supply headers are OPERABLE.

B.1 ← and B.2 2 required

realign OPERABLE AFW pumps to separate train supply headers within 2 hours (if both train supply headers are OPERABLE) and to restore the AFW train to

With one of the required AFW trains (pump or flow path) inoperable in MODE 1, 2, or 3 [for reasons other than Condition A], action must be taken to restore OPERABLE status within 72 hours. This Condition includes the loss of two steam supply lines to the turbine driven AFW pump. The 72 hour Completion Time is reasonable, based on redundant capabilities afforded by the AFW System, time needed for repairs, and the low probability of a DBA occurring during this time period.

Required Action B.1 to realign the OPERABLE pumps to separate supply headers preserves train separation and enhances system reliability. The two hours allowed for this action is reasonable based on operating experience to perform the specified task.

The second Completion Time for Required Action B.1 establishes a limit on the maximum time allowed for any combination of Conditions to be inoperable during any continuous failure to meet this LCO. 2 Insert 9

The 10 day Completion Time provides a limitation time allowed in this specified Condition after discovery of failure to meet the LCO. This limit is considered reasonable for situations in which Conditions A and B are entered concurrently. The AND connector between 72 hours and 10 days dictates that both Completion Times apply simultaneously, and the more restrictive must be met.

4 Insert 6

- If two AFW trains are inoperable in MODE 1, 2, or 3 for reasons other than Condition C, or
- If one or two feedwater injection headers are inoperable in MODE 1, 2, or 3.

C.1 and C.2 D.1 and D.2 , B.1, B.2, C.1, or C.2

When Required Action A.1 ~~for B.1~~ cannot be completed within the required Completion Time, or ~~if two AFW trains are inoperable in MODE 1, 2, or 3~~, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours, and in MODE 4 within [18] hours.

4
1

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

Rev. 4, Change 2

4
BASES
ACTION

In MODE 4, with one or two feedwater injection headers inoperable, operation is allowed to continue because the remaining OPERABLE injection header(s) provide a flow path to the SG(s) relied on for decay heat removal. Additionally, in Mode 4, the RHR loops may be used in lieu of or to supplement the SG(s) for decay heat removal consistent with the requirements of LCO 3.4.6, "RCS Loops - MODE 4."

If a motor-driven AFW pump is not available in MODE 4 and the SG(s) are relied on for decay heat removal then Condition F is applicable. However, in MODE 4, two RHR loops may be used for decay heat removal in lieu of the SG(s) consistent with the requirements of LCO 3.4.6, "RCS Loops - MODE 4."

AFW System
B 3.7.5

subjected to a reduction in MODE that could increase the likelihood of the AFW system being required to support heat removal.

In MODE 4 with two AFW trains inoperable, operation is allowed to continue because only one motor driven pump AFW train is required in accordance with the Note that modifies the LCO. ~~Although not required, the unit may continue to cool down and initiate RHR.~~

or if all three feedwater injection headers

E If all [three] AFW trains are inoperable in MODE 1, 2, or 3, the unit is in a seriously degraded condition with no safety related means for conducting a cooldown, and only limited means for conducting a cooldown with nonsafety related equipment. In such a condition, the unit should not be ~~performed by any action, including a power change that might result in a trip.~~ The seriousness of this condition requires that action be started immediately to restore one AFW train to OPERABLE status.

Required Action D.1 is modified by a Note indicating that all required MODE changes ~~or power reductions~~ are suspended until one AFW train is restored to OPERABLE status. In this case, LCO 3.0.3 is not applicable because it could force the unit into a less safe condition.

1
with the capability of providing flow to the steam generator(s).

or with the required feedwater injection header(s)

F In MODE 4, either the reactor coolant pumps or the RHR loops can be used to provide forced circulation. This is addressed in LCO 3.4.6, "RCS Loops - MODE 4." With one required AFW train inoperable, action must be taken to immediately restore the inoperable train to OPERABLE status. The immediate Completion Time is consistent with LCO 3.4.6.

6
SURVEILLANCE REQUIREMENTS

Insert 7
SR 3.7.5.1

6
Completing verification includes re-verifying these requirements by a second and independent operator.

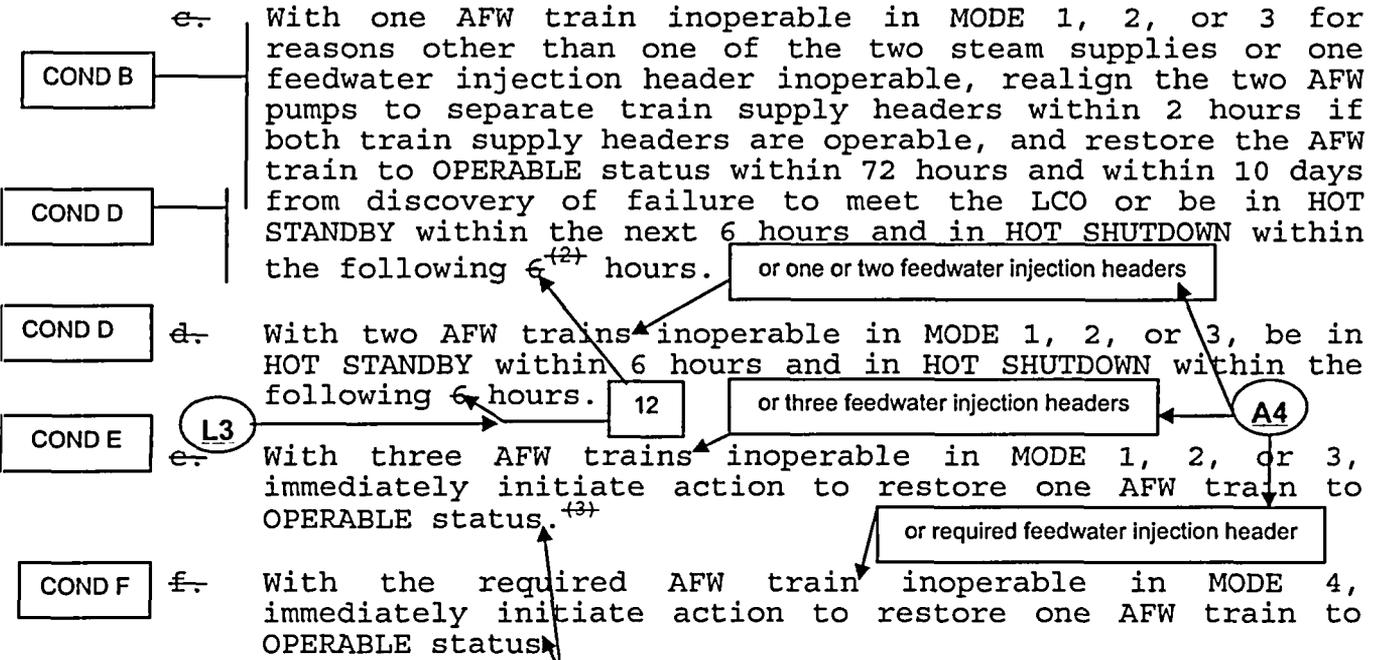
Verifying the correct alignment for manual, power operated, and automatic valves in the AFW System water and steam supply flow paths provides assurance that the proper flow paths will exist for AFW operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since they are verified to be in the correct position prior to locking, sealing, or securing. This SR also does not apply to valves that cannot be inadvertently misaligned, such as check valves. This Surveillance does not require any testing or valve manipulation; rather, it involves verification that those valves capable of being mispositioned are in the correct position.

The SR is modified by a Note that states one or more AFW trains may be considered OPERABLE during alignment and operation for steam

PLANT SYSTEMS

LIMITING CONDITION FOR OPERATION

ACTION (Continued)

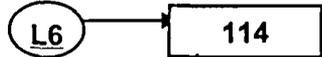


SURVEILLANCE REQUIREMENTS

----- GENERAL NOTE -----

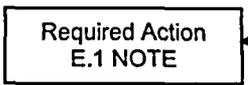
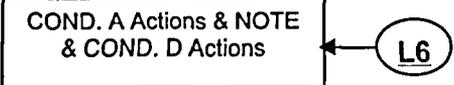
Establish and maintain constant communications between the control room and the auxiliary feed pump room while any normal AFW pump discharge valve is closed during surveillance testing.

Note: Only applicable if MODE 2 has not been entered following refueling.



(2) This time period may be extended for up to 90 hours for the turbine driven AFW pump provided that the plant has not entered MODE 2 following a refueling outage.

(3) LCO 3.0.3 and all other LCO ACTION statements requiring MODE changes are suspended until one AFW train is restored to OPERABLE status.



INSERTS FOR CTS 3.7.1.2 MARKUP

1. -----

- NOTE -

AFW train(s) may be considered OPERABLE during alignment and operation for steam generator level control, if it is capable of being manually realigned to the AFW mode of operation.

2. **CONDITION C**

C. Turbine driven AFW train inoperable due to one inoperable steam supply in MODE 1, 2 or 3. <u>AND</u> One motor driven AFW train inoperable in MODE 1, 2 or 3.	C.1 Restore the steam supply to the turbine driven train to OPERABLE status.	24 hours
	<u>OR</u> C.2 Restore the motor driven AFW train to OPERABLE status.	24 hours

3.

4.

time for restoration of the turbine-driven pump in Mode 3 prior to requiring the plant to be placed in Mode 4. Therefore, the CTS Action c cumulative time is considered to be a total of **162** hours (72+90) from entry into CTS Action c until entry into Mode 4 is required. The corresponding ITS 3.7.5 Condition A allows 7 days (168 hours) restoration time and ITS Condition D allows an additional 18 hours to transition from Mode 3 to Mode 4 whenever the turbine driven AFW pump is inoperable in Mode 3 prior to entering Mode 2 following a refueling outage. As such, the ITS cumulative time from entry into Condition A until entry into Mode 4 is required (by Condition D) is a total of **186** hours (168+18). Therefore, the ITS provides an additional **24** hours (**186-162**) beyond the time allowed in the CTS. The CTS has been revised to incorporate and extend the 90 hours provided in footnote (2) for restoring an inoperable turbine-driven AFW pump by an additional 24 hours for a total of **114** hours (90+24).

The actual format and presentation of the allowed Completion times is also revised to be consistent with the ISTS. This results in the Completion Times being included in ITS 3.7.5 Condition A (for the 7 day restoration time) and ITS Condition D (for the 18 hours to place the plant in Mode 4). This DOC is only intended to address the fact that the CTS time is being extended. The format changes associated with adopting the presentation of ISTS Action Conditions for these times are addressed by DOC A.1. This change is being made so the BVPS ISTS is consistent with the corresponding requirements of the ISTS.

The purpose of CTS 3.7.1.2 Action c and Footnote (2) is to provide additional time to complete any necessary repairs and testing of the turbine driven AFW pump prior to initiating a plant cool down to Mode 4. Corresponding ITS 3.7.5, Condition A, provides additional time for repairs and testing prior to requiring entry into Mode 4 and presents the allowed time in a substantially different format than the CTS.

The additional time provided by the ISTS reduces the number of unnecessary MODE changes and requests for enforcement discretion by providing added flexibility in Mode 3 to repair and test the turbine driven AFW pump following a refueling outage. This change is acceptable based upon the redundant capabilities afforded by the AFW system, the time needed to perform repairs and testing of the turbine driven pump, the reduced decay heat load following a refueling outage, and the low probability of a DBA occurring during this period that would require the operation of the turbine driven pump. This change is designated as less restrictive because additional time is allowed in the ISTS to restore equipment to within the LCO limits prior to exiting the Mode of Applicability than was allowed in the CTS.

More Restrictive Changes (M)

M.1 Not used.

- M.2 CTS surveillance 4.7.1.2.7 is revised by CTS Note 7 that states: "This surveillance is required to be performed prior to entry into MODE 2 whenever the plant has been in MODES 5 or 6 for greater than 30 continuous days." The corresponding ISTS surveillance contains a similar frequency for performance with the exception that the ISTS specifies that the surveillance is applicable after the plant has been in a "defueled" condition as well as in Modes 5 and 6. The CTS is revised to conform to the ISTS. This changes the CTS by expanding the operating conditions for which the cumulative time is tracked by CTS surveillance 4.7.1.2.7. As such, the proposed change requires the time spent in a defueled condition be accounted for as well as the time spent in Modes 5 and 6 for determining when surveillance 4.7.1.2.7 must be performed.

The purpose of CTS surveillance 4.7.1.2.7 (and the corresponding ISTS surveillance) is to verify the normal AFW flow Path to the steam generators. Both the ISTS and CTS surveillances require this surveillance to be performed based on how long the plant has been outside the applicable Modes for the AFW (i.e., in a condition where AFW was not required operable and may have been misaligned from its normal standby condition). However, the ISTS surveillance includes the time spent in a defueled condition as well as in Modes 5 and 6. The proposed change is acceptable because it continues to assure the required surveillance is