

**Richard G. Mende**  
Director, Site Operations

724-682-7773

October 24, 2006  
L-06-149

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. 296 and 169,  
Improved Standard Technical Specification Conversion**

This letter provides updated pages (Revision 4) to 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 supplement is to update the BVPS ITS conversion documentation contained in LAR Nos. 296 and 169 (ITS conversion) to incorporate the following:

- Approved License Amendments,
- Resolution of NRC comments, and
- Other changes identified during the NRC review process.

This submittal also includes hardcopy pages of the joint NRC-BVPS conversion website which is maintained (electronically) by the Excel Services Corporation. The attached hardcopy pages contain NRC questions and associated BVPS responses regarding the BVPS ITS conversion LAR. The hardcopy pages of the website are current as of September 2006 and show all the website question and response entries as closed.

As part of the ITS conversion License Amendment, FENOC requests that two new License Conditions be added to the BVPS Unit 1 Operating License and to the BVPS Unit 2 Operating License. The two License Conditions requested by FENOC are consistent with the Licensing Conditions approved by the NRC for other utilities that have recently converted to the ITS. The first License Condition addresses the

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performance requirements for new or revised Technical Specification Surveillances. The second License Condition addresses the disposition of Technical Specification requirements relocated to other documents as part of the ITS conversion. The following License Conditions are requested:

1. Schedule for New and Revised Surveillance Requirements (SRs)

The schedule for performing SRs that are new or revised in Amendment No. XXX shall be as follows:

For SRs that are new in this amendment, the first performance is due at the end of the first surveillance interval, which begins on the date of implementation of this amendment.

For SRs that existed prior to this amendment, whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment.

For SRs that existed prior to this amendment, whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to implementation of this amendment.

For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance subject to the modified acceptance criteria is due at the end of the first surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.

2. Relocation of Certain Technical Specification Requirements

License Amendment No. XXX authorizes the relocation of certain Technical Specifications to other licensee-controlled documents. Implementation of this amendment shall include relocation of the requirements to the specified documents, as described in (1) Section XX of the NRC staff's Safety Evaluation, and (2) Table LA, Removed Detail Changes, and Table R, Relocated Specifications, attached to the NRC staff's Safety Evaluation, which is enclosed in this amendment.

In addition to the request for new License Conditions, FENOC requests that Unit 1 License Condition C. (9), "Steam Generator Surveillance Interval Extension" and Unit 2 License Condition (C.12), "Steam Generator Surveillance Interval Extension" be deleted. These existing License Conditions provided a limited surveillance extension for the Unit 1 and Unit 2 Steam Generators based on specific dates which have expired. Therefore, Unit 1 License Condition C. (9) and Unit 2 License Condition (C.12) are no longer applicable.

Attachment 1 of this supplement contains the revised pages organized by individual changes, such that all the affected pages for each change are grouped together by a unique change number. The purpose of Attachment 1 is to facilitate the review of each change by providing all the affected pages for that change in one place. In addition, the revised pages included in Attachment 1 may be used to update the affected pages in the original 10 volume BVPS ITS conversion submittal.

Attachment 2 of this supplement contains the hardcopy pages of the joint NRC-BVPS conversion website.

This supplement completes the update of the BVPS ITS Conversion License Amendment documentation. With this supplement, all outstanding License Amendments affecting the BVPS ITS conversion LAR have been incorporated into the BVPS ITS Conversion documentation and all identified NRC comments resolved.

FENOC requests an implementation period of 150 days for the ITS conversion License Amendment after it is approved by the NRC.

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.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 24, 2006.

Sincerely,



Richard G. Mende

Attachments:

1. BVPS ITS Conversion (LARs 296 and 169) Revision 4 pages sorted by change number.
  2. Hardcopy of BVPS ITS Conversion Database entries.
- 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) (\*)

(\*) Electronic Copy