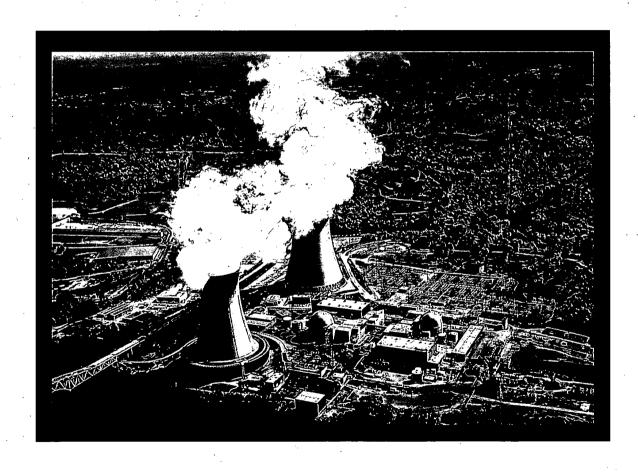
BEAVER VALLEY POWER STATION License Renewal Application



BVPS License Renewal Project

Presentation to NRC

Aug. 2, 2007



Introduction

Greg Halnon, Director Fleet Regulatory Affairs



AGENDA

- Introduction Greg Halnon
- 2005 project review Cliff Custer
- Current project overview Cliff Custer
- Oversight Greg Halnon
- Review Process Cliff Custer
- Submittal items of interest Cliff Custer
- Closing remarks Pete Sena



2005 Project Review

March 2005 NRC Letter:

- Information overly general
- Inadequate QA of renewal application
- Insufficient explanation of information
 - Lack of non-safety related structures & components scoping
 - Technically incorrect information
 - LRA inconsistencies
- Insufficient SAMA



2005 Project Review

2005 Project: Root Causes:

- Less than adequate participation in NRC & Industry Working Groups
- Inadequate regulatory interface
- Inadequate sponsorship & station ownership



2005 Project Review

Major Lessons Learned:

- FENOC must manage the project to remain current with industry and NRC standards
- Station personnel must own the results and be prepared to implement renewed licenses
- Improved management engagement and oversight are necessary
- LRA and support documents should be subjected to rigorous reviews by owner, third party and peers

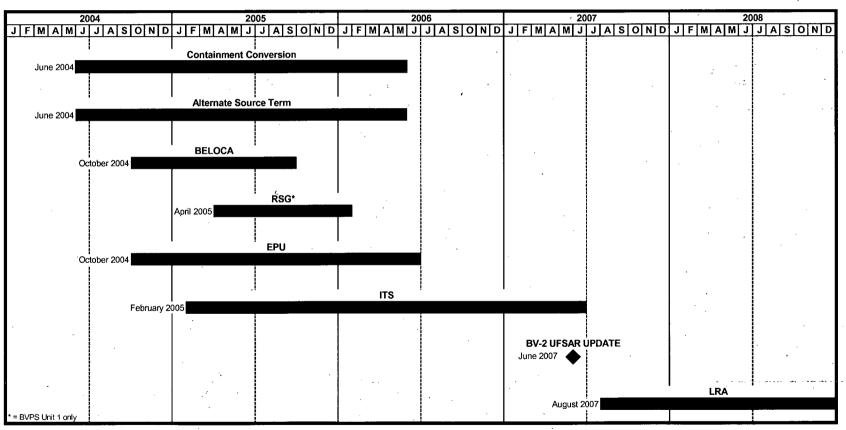


What's different this time?

- Root Causes & Lessons Learned have been addressed
- Industry Participation to remain current with standards
- Site Participation & use of Site-Specific Operating Experience
- CLB items related to License Renewal identified & addressed
- Built-in Quality Approval Structure, LRAB, Review Cycle (Internal/External Assessments)



Current Licensing Basis Reconciliation





Site Participation:

- Program evaluation documents & site operating experience
- Aging management review
- Specific TLAA updates & reviews
- SAMA
- Midland propane terminal evaluation



Industry Participation & NRC Interface

2005	2006	2007						
		Shearon Harris AMR Auit						
Working Group, Audits & Inspections								
*::12	20	18						
Millstone LRIW	GM Environmer Workshop	7". \ \ \ \ \ \ \ \						
NRC/ACRS Meetings								
3.56	11	5						
NRC/NEI LRTF Meetings & Conf. Calls								
5	10	7						
NRC & BVPS Specific Meetings								
23,	~4	5						



Industry Benchmarking Significance

LR Task Force & Working Groups

- Improved content
- Adjustments to program documents

Audits

- Detailed adjustments to support documents and the application
- Understanding of audit issues and logistics

Monthly NRC phone-calls & meetings

- Verify project actions are current
- Current expectations for the Environmental Report



Response to Industry Participation & Lessons Learned (cont.)

•Environmental report enhanced to address NRC concerns regarding:

- Clean Water Act 316 (b) information
- Non-rad waste, waste minimization and the 1990 Pollution Prevention Act information
- 1966 National Historic Preservation Act information
- Endangered Species Act threatened and Endangered Species Review



Oversight

Summary:

- Increased scrutiny from peer groups:
 - NEI Working Group Reviews of Guidance
 - Peer reviews in self-assessments
 - 3rd Party sufficiency review
- License Renewal Assessment Board
- Nuclear oversight performance based assessments
- Management Review of progress and quality indicators
- Final Licensing and site reviews



Oversight

LR Assessment Board Charter:

- Diverse membership:
 - FENOC corporate, BV Senior Leadership Team, plant experts, peers, industry experts, and legal advisor
- Scope of review Focused assessments and board meeting:
 - Assessment results and recommendations
 - Project guidelines current
 - Technical issues consistent with Current Licensing Basis
 - Deviations from GALL or other standards
 - LRA acceptable (NRC/Industry Standards)
- Timing for reviews:
 - 5 Reviews at key milestone events
- Board reports to BVPS site VP



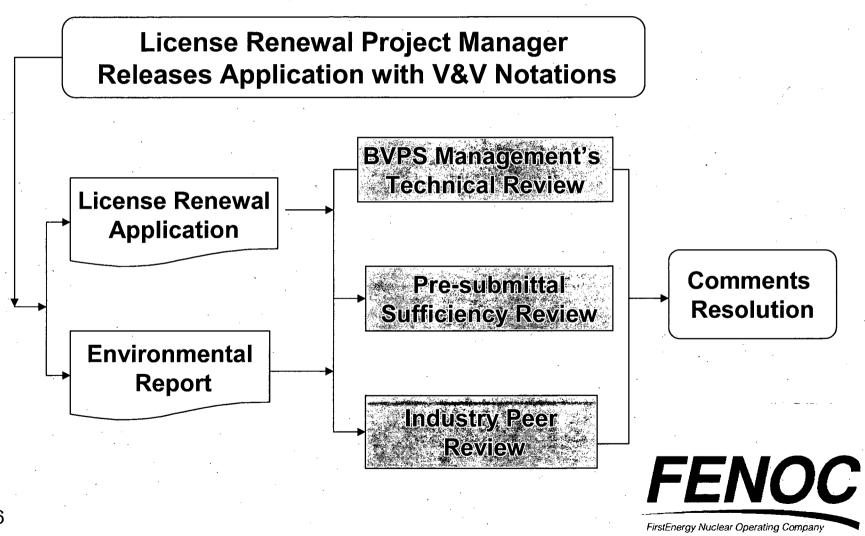
Oversight

LRAB Conclusions:

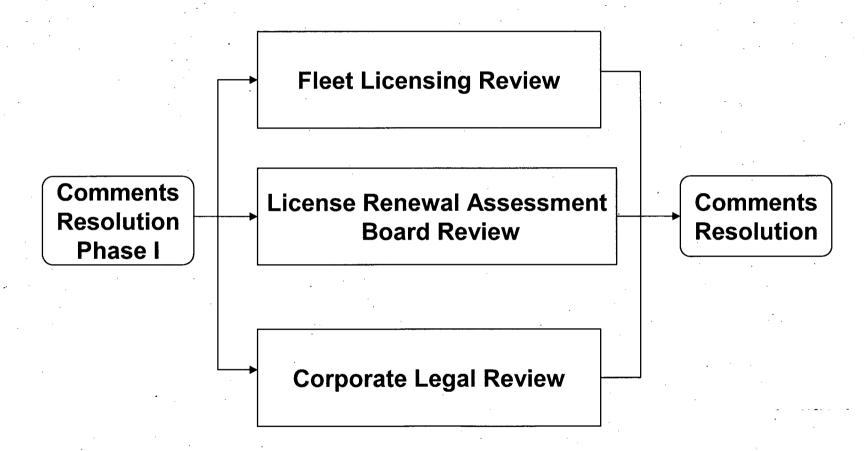
- Industry involvement & use of lessons learned was effective
- Procedures are aligned with current industry expectations
- Appropriate level of interaction with BVPS program owners
- Historical RAI evaluation is adequate
- Document structure supports LRA & NRC inspection & audits
- The review process through Phase 1 has been effective
- LRA adequate for submittal pending resolution of open items



Review - Phase I

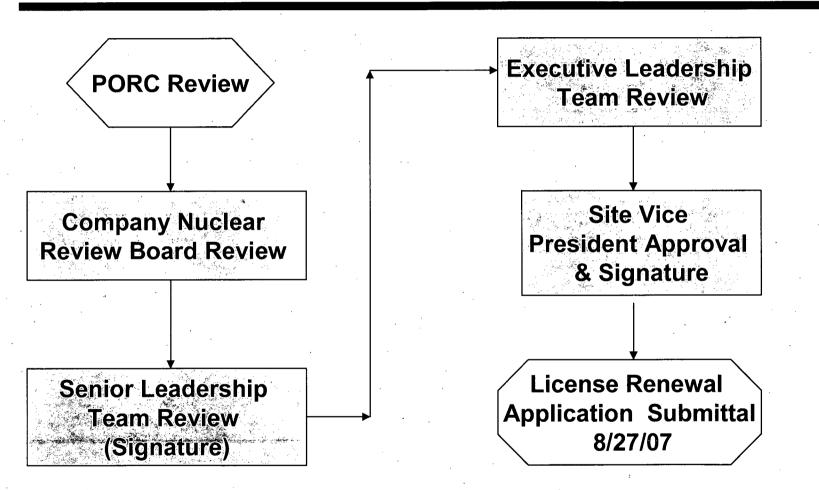


Review - Phase II



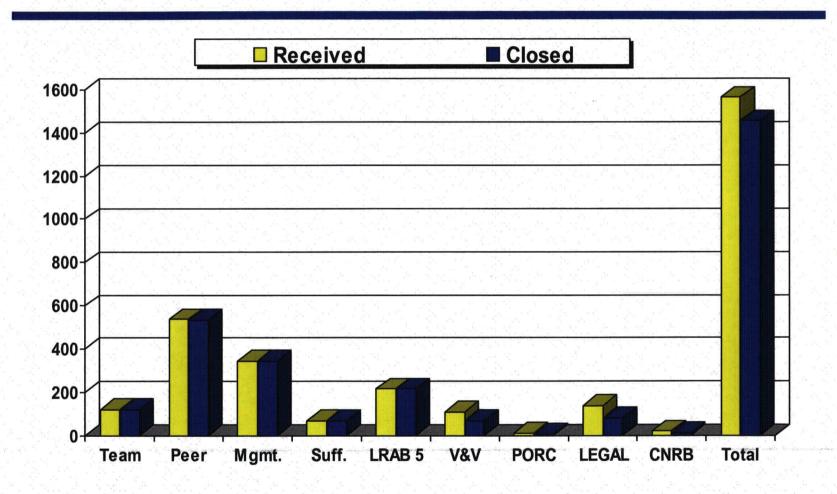


Review - Phase III





Review - Comments Status





- RT(PTS) evaluation
- Metal Fatigue DBD
- Midland Propane Terminal
- SAMA correction regarding SECPOP errors
- TLAA approach
- GALL conformance
- Environmental Report revision refurbishment



42 Total Aging Management Programs

16 New			26 Existing	
	•			
2 Plant - Specific	12 GALL	2 Future	2 Plant - Specific	24 GALL



Plant-Specific Programs - evaluated 4 programs:

- B.2.10: Electrical Cable Connections not subject to 10 CFR 50.49 environmental qualification requirements one-time inspection
- B.2.13: Electrical Wooden Poles/Structures inspection (Unit 2 Only)
- B.2.35: Reactor Vessel Integrity
- B.2.37: Settlement Monitoring (Unit 2 Only)



Variances & Exceptions:

- 7 Programs take exception to NUREG-1801
 - 4 ASME code programs: code edition
 - Fire protection: testing frequency of halon and
 CO₂ systems
 - Fuel Oil Chemistry: ASTM standards, additives,
 and periodic testing for microbiological activity
 - Selective Leaching: Brinell hardness testing



Action Items:

- Midland Propane Terminal
- PTS analysis docketing per 10CFR50.61
- Planned PRA peer evaluation
 - (Reg. Guide 1.200)
- NFPA 805 submittal schedule



Closing Remarks

Pete Sena, BVPS Site VP

