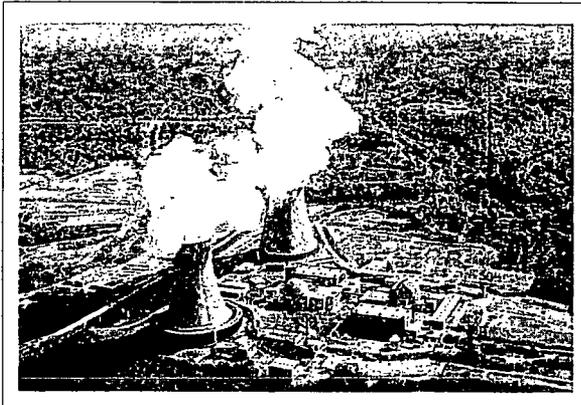


# **BEAVER VALLEY POWER STATION**

## ***License Renewal Application***



**BVPS License  
Renewal Project**

**Presentation to  
NRC**

**Aug. 2, 2007**

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## ***Introduction***

**Greg Halnon, Director Fleet  
Regulatory Affairs**

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## **AGENDA**

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- 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

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## ***2005 Project Review***

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### **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

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## ***2005 Project Review***

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### **2005 Project: Root Causes:**

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

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## ***2005 Project Review***

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### **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**

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## Current Project Overview

### What's different this time?

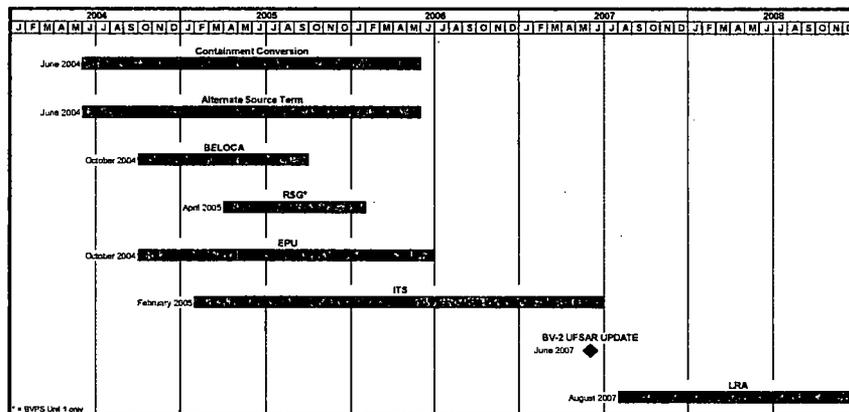
- Root Causes & Lessons Learned have been addressed
- Industry Participation to remain current with standards
- Site Participation & use of Site-Specific Operating Experience
- CLB items related to License Renewal identified & addressed
- Built-in Quality – Approval Structure, LRAB, Review Cycle (Internal/External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

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## Current Project Overview

### Current Licensing Basis Reconciliation



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## Current Project Overview

### Site Participation:

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

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## Current Project Overview

### Industry Participation & NRC Interface

2005	2006	2007
		Shearon Harris AMR Audit
<b>Working Group, Audits &amp; Inspections</b>		
12	20	18
Millstone LRIWGM	Environmental Workshop	Wolf Creek AMP & TLAA Audit
<b>NRC/ACRS Meetings</b>		
11	11	5
<b>NRC/NEI LRTF Meetings &amp; Conf. Calls</b>		
5	10	7
<b>NRC &amp; BVPS Specific Meetings</b>		
3	4	5

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## ***Industry Benchmarking Significance***

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- **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

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## ***Response to Industry Participation & Lessons Learned (cont.)***

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- **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

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## ***Oversight***

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### **Summary:**

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

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## ***Oversight***

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### **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**

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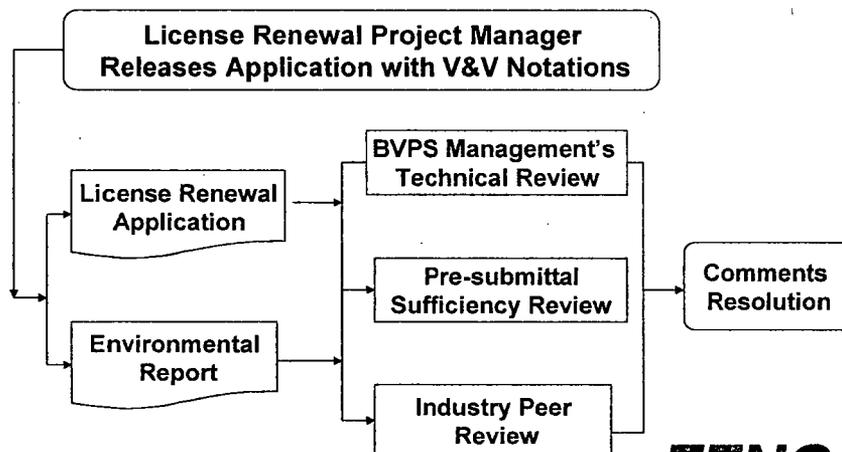
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# Oversight

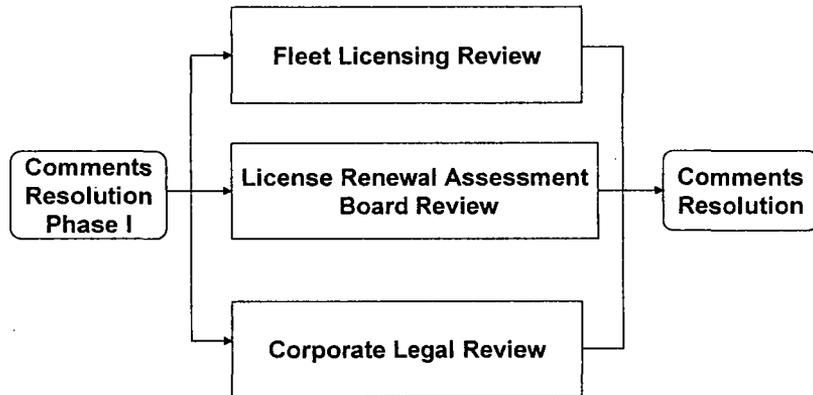
## LRAB Conclusions:

- 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



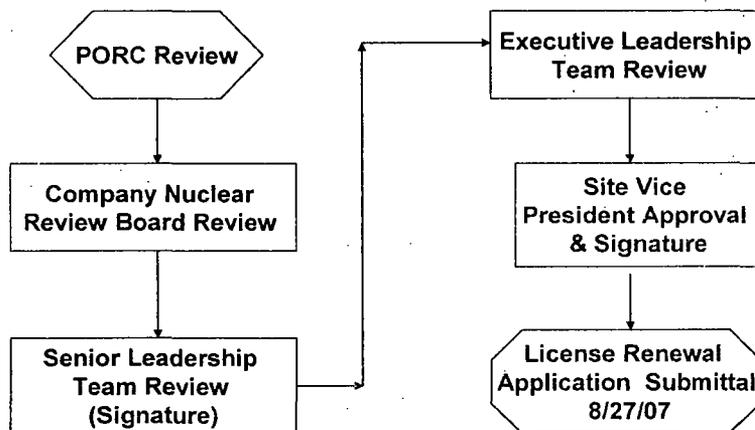
## Review - Phase II



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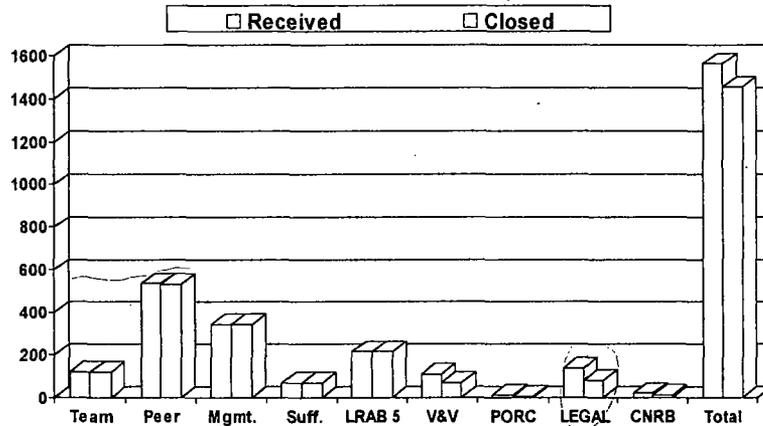
## Review - Phase III



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## Review - Comments Status



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## Submittal Items of Interest

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

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## **Submittal Items of Interest**

<b>42 Total Aging Management Programs</b>				
<b>16 New</b>			<b>26 Existing</b>	
<b>2 Plant - Specific</b>	<b>12 GALL</b>	<b>2 Future</b>	<b>2 Plant - Specific</b>	<b>24 GALL</b>

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## **Submittal Items of Interest**

### **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)

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## **Submittal Items of Interest**

### **Variations & Exceptions:**

- **7 Programs take exception to NUREG-1801**
  - 4 ASME code programs: code edition
  - Fire protection: testing frequency of halon and CO<sub>2</sub> systems
  - Fuel Oil Chemistry: ASTM standards, additives, and periodic testing for microbiological activity
  - Selective Leaching: Brinell hardness testing

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## **Submittal Items of Interest**

### **Action Items:**

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

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## ***Closing Remarks***

**Pete Sena, BVPS Site VP**

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