



FirstEnergy Nuclear Operating Company

**Peter P. Sena III**  
Site Vice President

724-682-5234  
Fax: 724-643-8069

March 31, 2008  
L-08-122

10 CFR 54

ATTN: Document Control Desk  
U. S. Nuclear Regulatory Commission  
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  
Reply to Request for Additional Information for the Review of the Beaver Valley Power Station, Units 1 and 2, License Renewal Application (TAC Nos. MD6593 and MD6594), and Revisions to License Renewal Application Boundary Drawings

Reference 1 provided the FirstEnergy Nuclear Operating Company (FENOC) License Renewal Application for the Beaver Valley Power Station (BVPS). Reference 2 provided License Renewal Application Boundary Drawings. Reference 3 requested additional information regarding BVPS license renewal scoping in Section 2.3.3 of the BVPS License Renewal Application. This letter provides the FENOC reply to the U.S. Nuclear Regulatory Commission (NRC) request for additional information (RAI) provided in Reference 3. In addition, this letter provides revised License Renewal Application Boundary Drawings that were originally provided in Reference 2. The revision to these license renewal drawings was necessary as a result of FENOC's response to the staff's RAI.

The Attachment provides the FENOC reply to the NRC RAI. The Enclosure provides revised License Renewal Application Boundary Drawings.

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Clifford I. Custer, Fleet License Renewal Project Manager, at 724-682-7139.

A108

MRR

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 31, 2008.

Sincerely,



Peter P. Sena III

References:

1. FENOC Letter L-07-113, "License Renewal Application," August 27, 2007.
2. FENOC Letter L-07-118, "License Renewal Application Boundary Drawings, August 27, 2007.
3. NRC Letter, "Request for Additional Information for the Review of the Beaver Valley Power Station, Units 1 and 2, License Renewal Application (TAC Nos. MD6593 and MD6594)," March 3, 2008.

Attachment:

Reply to Request for Additional Information Regarding Beaver Valley Power Station, Units 1 and 2, License Renewal Application, Sections 2.3.3.2 and 2.3.3.8.

Enclosure:

Revised License Renewal Application Boundary Drawings

cc: Mr. K. L. Howard, NRC Project Manager  
Mr. S. J. Collins, NRC Region I Administrator

cc: w/o Attachment or Enclosure  
Dr. P. T. Kuo, NRC Director, Division of License Renewal  
Mr. D. L. Werkheiser, NRC Senior Resident Inspector  
Ms. N. S. Morgan, NRR Project Manager  
Mr. D. J. Allard, Director BRP/DEP  
Mr. L. E. Ryan (BRP/DEP)

ATTACHMENT  
L-08-122

Reply to Request for Additional Information Regarding  
Beaver Valley Power Station, Units 1 and 2,  
License Renewal Application, Sections 2.3.3.2 and 2.3.3.8  
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**Question RAI 2.3.3.2-01**

**LR Drawing 1-44B-1: At drawing coordinates C-6, valves VS-D-4-11B and VS-D-4-11A are shown receiving a containment isolation signal, phase B (CIB). This seems to indicate that these valves are used as an isolation barrier following a CIB signal. LR Drawing 1-44B-1 indicates these valves are in scope for fire protection only. Please explain why these valves and associated duct between the valves and from the valves to the penetration are not in scope as a pressure boundary or leakage barrier.**

**RESPONSE RAI 2.3.3.2-01**

The License Renewal (LR) Drawing Note, indicating that these valves are in scope for fire protection only, was in error. Valves VS-D-4-11A and VS-D-4-11B are safety-related and provide an isolation function. However, some ductwork associated with these valves should also have been included in scope. FENOC has added the required ductwork associated with VS-D-4-11A and VS-D-4-11B to scope for 10 CFR 54.4(a)(2) structural support of the safety-related valves.

Valves VS-D-4-11A and VS-D-4-11B receive a CIB signal to isolate the supply of nonsafety-related (NSR) ventilation cooling. Isolation of the NSR ventilation supply limits the potential spread of airborne activity prior to its collection by the Supplementary Leak Collection and Release System (SLCRS). The isolation function is safety-related, but the only safety-related components in the system are VS-D-4-11A and VS-D-4-11B. These valves are shown highlighted in red on LR drawing 1-44B-1. LR Drawing Note 1, "All highlighted components on the drawing are in scope for fire protection only," was in error, and has been corrected to indicate, "All red highlighted components on this drawing with the exception of VS-D-4-11A and VS-D-4-11B are in scope for fire protection only." Isolation of the ventilation supply does not require integrity of any ductwork. Failure of the ductwork will not result in ventilation flow being delivered to the area when isolation is desired. However, all of the ductwork downstream of the valves, and the ductwork upstream of the valves to the flexible connection at the supply fan discharge was added to scope per 10 CFR 54.4(a)(2) to ensure adequate support of the safety-related dampers, and was highlighted in green on LR Drawing 1-44B-1. The addition of the ductwork to scope does not affect any LR Application text or result in any Aging Management Review (AMR) changes, since the added ductwork is represented in LR Application Table 3.3.2-2, rows 27, 28 and 29.

See revised LR Drawing 1-44B-1 in the Enclosure to this letter.

**Question RAI 2.3.3.2-02**

**LR Drawing 2-44B-3: At drawing coordinates C-3, shows a direct expansion cooling unit 2HVP-ACUS301. There are two pipe connections shown for this unit, a capped line and a 3/4 - inch hose connection. Is there a condensate drain for the cooling unit? If so, is the condensate drain in scope for 10 CFR 54.4(a)(2) for leakage?**

**RESPONSE RAI 2.3.3.2-02**

2HVP-ACUS301 was locally verified to have a condensate drain line. The drain line corresponds to the 3/4 - inch line with a hose connection that is shown on LR drawing 2-44B-3. There is no permanent drain piping beyond the hose connection. The air handling unit is classified safety-related both on the ventilation (air) side and on the cooling (freon) side, so the condensate drain line has the same quality classification, and is highlighted in red (safety-related) on LR drawing 2-44B-3. Since the drain line is considered to be safety-related, it was not assigned a 10 CFR 54.4(a)(2) nonsafety-related function.

**Question RAI 2.3.3.8-01**

- a. LR Drawing 2-47-1 : At drawing coordinates C-8/9 the lines from panel 2PHS-EALI associated with the connections labeled 'CNMT. BLKD. SHAFT "A" SEAL TEST CONN.' and 'CNMT. BLKD. SHAFT "B" SEAL TEST CONN.' are not highlighted as being in scope while the lines from the connections labeled "CTMT. BLKD. DOOR SEAL TEST CONN." and "ATMOS. BLKD. SHAFT "A" SEAL TEST CONN." are highlighted as being in scope. Both sets of lines appear to enter the hatch airlock volume. Explain why the scoping difference.**

**RESPONSE RAI 2.3.3.8-01.a**

- a. Highlighting for the emergency airlock shaft seal test lines was incorrectly omitted. Revised LR Drawing 2-47-1 correctly depicts all emergency airlock test lines highlighted in red (in scope). This change does not affect any LR Application text or AMR table results.

See revised LR Drawing 2-47-1 in the Enclosure to this letter.

- b. Also, the test panel connection labels 'ATMOS. BLKD. SHAFT "A" SEAL TEST CONN', 'ATMOS. BLKD. DOOR SEAL TEST CONN.' and 'ATMOS. BLKD. SHAFT "B" SEAL TEST CONN' do not appear to match up with the lines whose test connections they are closest to. Please clarify this labeling arrangement.**

RESPONSE RAI 2.3.3.8-01.b

- b. The emergency airlock test connection labels shown on LR Drawing 2-47-1 were incorrect and are correctly shown on revised LR Drawing 2-47-1. As shown on the revised drawing, the test panel connection labels align with the lines closest to the test connections.

See revised LR Drawing 2-47-1 in the Enclosure to this letter.

**ENCLOSURE**

**Beaver Valley Power Station (BVPS) Unit Nos. 1 and 2**

**Letter L-08-122**

**Revised License Renewal Application Boundary Drawings**

The following License Renewal Application Boundary Drawings  
have been revised and are enclosed:

**LR Drawing 1-44B-1    Revision 4**

**LR Drawing 2-47-1    Revision 5**

**THIS PAGE IS AN  
OVERSIZED DRAWING OR  
FIGURE,  
THAT CAN BE VIEWED AT THE RECORD  
TITLED:**

**“LR DRAWING 1-44B-1, Rev 4  
Air Vent and Cooling System (vs)”**

**WITHIN THIS PACKAGE... OR  
BY SEARCHING USING THE  
DOCUMENT/REPORT NO.**

**LR Drawing 1-44B-1**

**D-01**

**THIS PAGE IS AN  
OVERSIZED DRAWING OR  
FIGURE,  
THAT CAN BE VIEWED AT THE RECORD  
TITLED:**

**“LR DRAWING 2-47-1, Rev 5  
Containment Air Locks & Fuel  
Transfer Tube System (PHS).”**

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DOCUMENT/REPORT NO.**

**LR Drawing 2-47-1**

**D-02X**