

James H. Lash
President and Chief Nuclear Officer330-384-7944
Fax: 330-384-5669August 2, 2010
L-10-202

10 CFR 20

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT:

Beaver Valley Power Station, Unit Nos. 1 and 2
Docket No. 50-334, License No. DPR-66
Docket No. 50-412, License No. NPF-73Davis-Besse Nuclear Power Station, Unit No. 1
Docket No. 50-346, License No. NPF-3Perry Nuclear Power Plant, Unit No. 1
Docket No. 50-440, License No. NPF-58
Request for Authorization for Use of Delta Protection Mururoa BLU Single-Use
Respiratory Protection Suits

Pursuant to the provisions of 10 CFR 20.1703, "Use of Individual Respiratory Protection Equipment," and 10 CFR 20.1705, "Application for Use of Higher Assigned Protection Factors," the FirstEnergy Nuclear Operating Company (FENOC) requests Nuclear Regulatory Commission (NRC) authorization to use the Delta Protection Mururoa BLU single-use respiratory protection suits described in "Topical Report of Delta Protection Mururoa BLU Suit System" (TR MURUBLU05NP). The use of the Mururoa BLU suit will be included as an option in the FENOC respiratory protection program.

FENOC will use the Mururoa BLU suits consistent with Section 6.4 of topical report TR MURUBLU05NP and within the configuration, limitations, and conditions of use specified in Section 4.0 of the NRC safety evaluation dated April 10, 2006 for TR MURUBLU05NP (ADAMS Accession No. ML060950499). The Attachment lists the commitments associated with the aforementioned documents.

Use of these suits will improve worker safety while working in high surface contaminated areas and in high and potentially high airborne radioactivity areas. In addition, the full body cooling effect will help to minimize heat stress concerns.

FENOC requests approval for use of the Mururoa BLU suits by December 31, 2010. This will allow FENOC to proceed with the procedure changes and training necessary to support the Perry Nuclear Power Plant, Unit No. 1 April 2011 refueling outage.

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If there are any questions or if additional information is required, please contact
Mr. Thomas A. Lentz, Manager – Fleet Licensing, at (330) 761-6071.

Sincerely,



James H. Lash

Attachment:
Regulatory Commitment List

cc: NRC Region I Administrator
NRC Region III Administrator
NRC Project Manager - Beaver Valley Power Station
NRC Project Manager - Davis-Besse Nuclear Power Station
NRC Project Manager - Perry Nuclear Power Plant
NRC Resident Inspector - Beaver Valley Power Station
NRC Resident Inspector - Davis-Besse Nuclear Power Station
NRC Resident Inspector - Perry Nuclear Power Plant
Director BRP/DEP
Site Representative BRP/DEP
Executive Director, Ohio Emergency Management Agency,
State of Ohio (NRC Liaison)
Utility Radiological Safety Board

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Regulatory Commitment List
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The following list identifies those actions committed to by FirstEnergy Nuclear Operating Company (FENOC) for Beaver Valley Power Station, Unit Nos. 1 and 2; Davis-Besse Nuclear Power Station, Unit No. 1; and Perry Nuclear Power Plant, Unit No. 1 in this document. Any other actions discussed in the submittal represent intended or planned actions by FENOC. They are described only as information and are not Regulatory Commitments. Please contact Mr. Thomas A. Lentz, Manager – Fleet Licensing, at (330) 761-6071 of any questions regarding this document or associated Regulatory Commitments.

Regulatory Commitment

Due Date

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| 1. The Mururoa BLU suits will be used in a configuration consisting of: a Mururoa BLU one-piece encapsulating suit of either PVC or Ethyfuge construction, fitted with a Micronel C500X-012EK-AB60 blower with a C501A-012Ak-A battery [consistent with the parts list in Section 7 of Attachment 6.6.6 to Topical Report MURUBLU05NP (ADAMS Accession No. ML053060280)], and four Scott FP 10 P3, or four Delta Protection P3, high efficiency particulate filter cartridges. All four filter cartridges must be matching and replaced as a set. | Prior to placing the suit in service at the site. |
| 2. Procedures for use of the Mururoa BLU suits will be integrated into the respiratory programs required by Subpart H of 10 CFR Part 20. Fit testing of user is not applicable to fully encapsulating suits. Wearers will be trained on these conditions of use, as well as the emergency escape features of the suit enclosure. | Prior to placing the suit in service at the site. |
| 3. Procedures will require the Mururoa BLU suits to be used in accordance with recommendations in Attachments 6.6.4, 6.6.5, and 6.6.6 of Topical Report MURUBLU05NP. | Prior to placing the suit in service at the site. |

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| 4. Procedures will require the Mururoa BLU suit enclosures to be single use only, and be discarded after use. Unused suit enclosures will be stored in their original manufacturer's packing in an environment not colder than 32 degrees Fahrenheit (°F), nor hotter than 140°F, with a maximum storage shelf-life of 3 years. Suits are not to come in contact with anything colder than 41°F, nor hotter than 140°F, during use. | Prior to placing the suit in service at the site. |
| 5. Procedures will require the Mururoa BLU suits to be donned with a fully charged battery pack installed on the blower. The maximum period of use (timed from a fully charged battery) is 4 hours with the blower set at 600 liters/minute, and 7 hours with the blower set at 400 liters/minute. | Prior to placing the suit in service at the site. |
| 6. Procedures will require the Mururoa BLU suits to be used only in atmospheres containing specific contaminants in concentrations that are not immediately dangerous to life or health (IDLH), as given in NIOSH "Concept for Industrial Power, Air-purifying Respiratory Standard," Draft for Comment, May 30, 2005, and have an oxygen content of at least 19.5 percent by volume. | Prior to placing the suit in service at the site. |
| 7. Communication channels will be established between FENOC and Delta Protection to report any defects, if experienced, with the Mururoa BLU suit, and to ensure that any manufacturer's notifications concerning the suit systems are received in a timely manner. | Prior to placing the suit in service at the site. |
| 8. The Mururoa BLU suits will be integrated into the respiratory protection programs, using the information provided by the manufacturer. | Prior to placing the suit in service at the site. |
| 9. Lesson plans will be developed to train workers on the Mururoa BLU suit features, donning, use and removal, cautions, and use of mouth strips and tear off strips for routine and emergency egress. | Prior to placing the suit in service at the site. |
| 10. Health Physics personnel will be provided additional training for selection, approval, issue, equipment set-up, operation and maintenance of the Mururoa BLU suits. | Prior to placing the suit in service at the site. |