



FirstEnergy Nuclear Operating Company

76 South Main Street  
Akron, Ohio 44308

**Peter P. Sena III**  
President and Chief Operating Officer

October 26, 2012  
L-12-379

10 CFR 2.202

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-001

**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-73  
Davis-Besse Nuclear Power Station  
Docket No. 50-346, License No. NPF-3  
Perry Nuclear Power Plant  
Docket No. 50-440, License No. NPF-58  
FirstEnergy Nuclear Operating Company's (FENOC's) Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

**References:**

1. Nuclear Regulatory Commission (NRC) Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events
2. NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012
3. Nuclear Energy Institute (NEI) Letter to NRC, Industry Initiative on Procurement of Equipment for the Diverse and Flexible Coping Strategy (FLEX), dated February 24, 2012
4. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012

On March 12, 2012, the NRC issued an order (Reference 1) to FENOC. Reference 1 was immediately effective and directs FENOC to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 requires submission of an initial status report 60 days following issuance of the final interim staff guidance. The final interim staff guidance (Reference 2) was issued August 30, 2012. The purpose of this letter is to provide the initial status report pursuant to Section IV, Condition C.2, of Reference 1 within 60 days following issuance of Reference 2. This report confirms FENOC has received Reference 2 and is in the process of evaluating the guidance for the purpose of establishing mitigation strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event as described in Attachment 2 of Reference 1.

Major activities completed during this reporting period:

- Additional portable equipment was ordered prior to the issuance of Reference 2, as described in an NEI letter to the NRC (Reference 3).
- A site-specific evaluation is in progress to establish the coping capabilities as defined in NEI 12-06 (Reference 4).
- Resources are being identified and project plans initiated, including development of milestones, to assure compliance with Reference 1.

Planned activities for the next six months:

- Development and submittal of the overall integrated plan.

Technical difficulties encountered that could affect the ability to provide the licensee's February 28, 2013, submittal:

- None at this time.

Project milestones schedule through completion of installation and testing:

- A project milestones schedule will be provided with the overall integrated plan.
- Implementation of the order will be completed for Beaver Valley Power Station (BVPS) Unit No. 1 prior to startup from Refueling Outage (RFO) 1R23 (Spring 2015).
- Implementation of the order will be completed for BVPS Unit No. 2 prior to startup from RFO 2R18 (Fall 2015).
- Implementation of the order will be completed for Davis-Besse Nuclear Power Station (DBNPS) prior to startup from RFO 1R19 (Spring 2016).
- Implementation of the order will be completed for Perry Nuclear Power Plant (PNPP) prior to startup from RFO 1R15 (Spring 2015).

This letter contains no new regulatory commitments. If you have any questions regarding this report, please contact Mr. Thomas A. Lentz, Manager – Fleet Licensing, at 330-315-6810.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on  
October 26, 2012.

Respectfully submitted,



Peter P. Sena, III

cc: Director, Office of Nuclear Reactor Regulation (NRR)  
NRC Region I Administrator  
NRC Region III Administrator  
NRC Resident Inspector (BVPS)  
NRC Resident Inspector (DBNPS)  
NRC Resident Inspector (PNPP)  
NRC Project Manager (BVPS)  
NRC Project Manager (DBNPS)  
NRC Project Manager (PNPP)  
Ms. Jessica A. Kratchman, NRR/JLD/PMB, NRC  
Mr. Eric E. Bowman, NRR/DPR/PGCB, NRC or Ms. Eileen M. Mckenna,  
NRO/DSRA/BPTS, NRC  
Director BRP/DEP  
Site BRP/DEP Representative  
Utility Radiological Safety Board