

Peter P. Sena III
President and Chief Nuclear Officer

August 26, 2013
L-13-244

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) First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)
(TAC Nos. MF0799, MF0800, MF0960, and MF0802)

On March 12, 2012, the Nuclear Regulatory Commission (NRC or Commission) issued an order (Reference 1) to FENOC. Reference 1 was immediately effective and directs FENOC to have a reliable indication of the water level in associated spent fuel storage pools. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C. Reference 2 endorses industry guidance document Nuclear Energy Institute (NEI) 12-02, Revision 1 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the FENOC initial status report regarding requirements for reliable spent fuel pool instrumentation. Reference 5 provided the FENOC overall integrated plan for Beaver Valley Power Station, Unit Nos. 1 and 2 (BVPS), Davis-Besse Nuclear Power Station (DBNPS), and Perry Nuclear Power Plant (PNPP).

Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 3 provides direction regarding the content of the status reports. The purpose of this letter is to provide the first six-month

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status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The attached reports for BVPS, DBNPS, and PNPP (Attachments 1, 2, and 3, respectively) provide an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

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.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 26, 2013.

Respectfully submitted,



Peter P. Sena, III

Attachments:

1. Beaver Valley Power Station First Six-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation
2. Davis-Besse Nuclear Power Station First Six-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation
3. Perry Nuclear Power Plant First Six-Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation

References:

1. NRC Order Number EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, dated March 12, 2012
2. NRC Interim Staff Guidance JLD-ISG-2012-03, Compliance with Order EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, Revision 0, dated August 29, 2012
3. NEI 12-02, Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," Revision 1, dated August 2012
4. FirstEnergy Nuclear Operating Company's (FENOC's) Initial Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard

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- to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated October 26, 2012
5. FirstEnergy Nuclear Operating Company's (FENOC's) Overall Integrated Plan in Response to March 12, 2012 Commission Order Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 27, 2013

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. Lisa M. Regner, NRR/JLD/PMB, NRC
Mr. Blake A. Purnell, NRR/JLD/PMB, NRC
Director BRP/DEP (without Attachments)
Site BRP/DEP Representative (without Attachments)
Utility Radiological Safety Board (without Attachments)

Attachment 1
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Beaver Valley Power Station First Six-Month Status Report for the Implementation of
Order EA-12-051, Order Modifying Licenses with Regard to
Reliable Spent Fuel Pool Instrumentation
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1 Introduction

FirstEnergy Nuclear Operating Company (FENOC) developed an Overall Integrated Plan (OIP) for Beaver Valley Power Station (BVPS), Unit Nos. 1 and 2 (Reference 1 in Section 8), documenting the requirements to install reliable spent fuel pool (SFP) level instrumentation (LI), in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the OIP, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2 Milestone Accomplishments

The following milestone(s) have been completed since the submittal of the OIP (Reference 1). This update is current as of July 29, 2013.

- Commenced SFP instrumentation procurement. FENOC issued the purchase order for two trains of reliable SFP LI for each BVPS unit.

3 Milestone Schedule Status

The following provides an update to the milestone schedule to support the OIP. This section provides the activity status of each item, and the expected completion date, noting any change. The dates are planning dates subject to change as design and implementation details are developed.

The following milestones are being added as part of this update to reflect the submittal of each response to a request for additional information (RAI).

Submit Six-Month Status Updates

- Update 1: August 2013
- Update 2, including response to RAI-1 (parts a and b), RAI-2, RAI-3, RAI-4, RAI-5, RAI-6, and RAI-7: February 2014
- Update 3, including response to RAI-8, RAI-10, and RAI-11: August-2014
- Update 4: February 2015
- Update 5: August 2015

The revised milestone target completion dates do not impact the order implementation date.

Milestone	Target Completion Date	Activity Status (as of 7/29/13)	Revised Target Completion Date
Submit Six-Month Status Updates (Unit Nos. 1 and 2)			
<i>Update 1</i>	N/A	Started	August 2013
<i>Update 2, including response to RAI-1 (parts a and b), RAI-2, RAI-3, RAI-4, RAI-5, RAI-6, and RAI-7</i>	N/A	Not Started	February 2014
<i>Update 3, including response to RAI-8, RAI-10, and RAI-11</i>	N/A	Not Started	August 2014
<i>Update 4</i>	N/A	Not Started	February 2015
<i>Update 5</i>	N/A	Not Started	August 2015
BVPS Unit No. 1			
Commence SFP Instrumentation Design	4Q12	Complete	
Commence SFP Instrumentation Procurement	2Q13	Complete	
Complete SFP Instrumentation Design	4Q13	Started	
SFP Instrumentation Delivery	2Q14	Not Started	
Begin SFP Instrumentation Installation	3Q14	Not Started	
Commissioning of SFP Instrumentation	2Q15	Not Started	
NRC Order Implementation Date (based on the scheduled end of the second refueling outage after implementation plan submittal)	Spring 2015	Not Started	
BVPS Unit No. 2			
Commence SFP Instrumentation Design	4Q12	Complete	
Commence SFP Instrumentation Procurement	2Q13	Complete	
Complete SFP Instrumentation Design	4Q13	Started	
SFP Instrumentation Delivery	3Q14	Not Started	
Begin SFP Instrumentation Installation	4Q14	Not Started	
Commissioning of SFP Instrumentation	4Q15	Not Started	
NRC Order Implementation Date (based on the scheduled end of the second refueling outage after implementation plan submittal)	Fall 2015	Not Started	

4 Changes to Compliance Method

There are no changes to the compliance method as documented in the OIP (Reference 1).

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

FENOC expects to comply with the order implementation date. Relief/relaxation is not required at this time.

6 Open Items from Overall Integrated Plan and Draft Safety Evaluation

None.

7 Potential Draft Safety Evaluation Impacts

There are no potential impacts to the draft safety evaluation identified at this time.

8 References

The following references support the updates to the OIP described in this attachment.

1. FirstEnergy Nuclear Operating Company's (FENOC's) Overall Integrated Plan in Response to March 12, 2012 Commission Order Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 27, 2013.
2. NRC Order Number EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, dated March 12, 2012.

Davis-Besse Nuclear Power Station First Six-Month Status Report for the
Implementation of Order EA-12-051, Order Modifying Licenses with Regard to
Reliable Spent Fuel Pool Instrumentation
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1 Introduction

FirstEnergy Nuclear Operating Company (FENOC) developed an Overall Integrated Plan (OIP) for Davis-Besse Nuclear Power Station (Reference 1 in Section 8), documenting the requirements to install reliable spent fuel pool (SFP) level instrumentation (LI), in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the OIP, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2 Milestone Accomplishments

The following milestone(s) have been completed since the submittal of the OIP (Reference 1). This update is current as of July 29, 2013.

- Commenced SFP instrumentation procurement. FENOC issued the purchase order for two trains of reliable SFP LI.

3 Milestone Schedule Status

The following provides an update to the milestone schedule to support the OIP. This section provides the activity status of each item, and the expected completion date, noting any change. The dates are planning dates subject to change as design and implementation details are developed.

As of July 29, 2013, the FENOC response to Reference 3 was in progress; however, this response was subsequently submitted on August 12, 2013. To assist in the review process, the following milestones are being added as part of this update to reflect the submittal of each response to a request for additional information (RAI).

Submit Six-Month Status Updates

- Update 1: August 2013
- Update 2, including response to RAI-1, RAI-2, RAI-3, RAI-4, RAI-5, RAI-6, and RAI-7: February 2014
- Update 3, including response to RAI-8, RAI-10, and RAI-11: August 2014
- Update 4: February 2015
- Update 5: August 2015
- Update 6: February 2016

The revised milestone target completion dates do not impact the order implementation date.

Milestone	Target Completion Date	Activity Status (as of 7/29/13)	Revised Target Completion Date
Submit Six-Month Status Updates			
<i>Update 1</i>	N/A	Started	August 2013
<i>Update 2, including response to RAI-1, RAI-2, RAI-3, RAI-4, RAI-5, RAI-6, and RAI-7</i>	N/A	Not Started	February 2014
<i>Update 3, including response to RAI-8, RAI-10 and RAI-11</i>	N/A	Not Started	August 2014
<i>Update 4</i>	N/A	Not Started	February 2015
<i>Update 5</i>	N/A	Not Started	August 2015
<i>Update 6</i>	N/A	Not Started	February 2016
Commence SFP Instrumentation Design	4Q12	Complete	
Commence SFP Instrumentation Procurement	2Q13	Complete	
Complete SFP Instrumentation Design	1Q14	Started	4Q13
SFP Instrumentation Delivery	4Q14	Not Started	
Begin SFP Instrumentation Installation	1Q15	Not Started	
Commissioning of SFP Instrumentation	2Q16	Not Started	
NRC Order Implementation Date (based on the scheduled end of the second refueling outage after implementation plan submittal)	Spring 2016	Not Started	

4 Changes to Compliance Method

There are no changes to the compliance method as documented in the OIP (Reference 1).

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

FENOC expects to comply with the order implementation date. Relief/relaxation is not required at this time.

6 Open Items from Overall Integrated Plan and Draft Safety Evaluation

None.

7 Potential Draft Safety Evaluation Impacts

There are no potential impacts to the draft safety evaluation identified at this time.

8 References

The following references support the updates to the OIP described in this attachment.

1. FirstEnergy Nuclear Operating Company's (FENOC's) Overall Integrated Plan in Response to March 12, 2012 Commission Order Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 27, 2013.
2. NRC Order Number EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, dated March 12, 2012.
3. NRC Letter, Davis-Besse Nuclear Power Station, Unit 1 – Request for Additional Information Regarding Overall Integrated Plan for Reliable Spent Fuel Pool Instrumentation (TAC No. MF0960), dated July 17, 2013.

Perry Nuclear Power Plant First Six-Month Status Report for the Implementation of
Order EA-12-051, Order Modifying Licenses with Regard to
Reliable Spent Fuel Pool Instrumentation
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1 Introduction

FirstEnergy Nuclear Operating Company (FENOC) developed an Overall Integrated Plan (OIP) for Perry Nuclear Power Plant (Reference 1 in Section 8), documenting the requirements to install reliable spent fuel pool (SFP) level instrumentation (LI), in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the OIP, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2 Milestone Accomplishments

The following milestone(s) have been completed since the submittal of the OIP (Reference 1). This update is current as of July 29, 2013.

- Commenced SFP instrumentation procurement. FENOC issued the purchase order for two trains of reliable SFP LI.

3 Milestone Schedule Status

The following provides an update to the milestone schedule to support the OIP. This section provides the activity status of each item, and the expected completion date, noting any change. The dates are planning dates subject to change as design and implementation details are developed.

The following milestones are being added as part of this update to reflect the submittal of each response to a request for additional information (RAI).

Submit Six-Month Status Updates

- Update 1: August 2013
- Update 2, including response to RAI-1 (part c), RAI-2, RAI-3, RAI-4, RAI-5, RAI-6, and RAI-7: February 2014
- Update 3, including response to RAI-8, RAI-10, and RAI-11: August 2014
- Update 4: February 2015

The revised milestone target completion dates do not impact the order implementation date.

Milestone	Target Completion Date	Activity Status (as of 7/29/13)	Revised Target Completion Date
Submit Six-Month Status Updates			
<i>Update 1</i>	N/A	Started	August 2013
<i>Update 2, including response to RAI-1 (part c), RAI-2, RAI-3, RAI-4, RAI-5, RAI-6, and RAI-7</i>	N/A	Not Started	February 2014
<i>Update 3, including response to RAI-8, RAI-10, and RAI-11</i>	N/A	Not Started	August 2014
<i>Update 4</i>	N/A	Not Started	February 2015
Commence SFP Instrumentation Design	4Q12	Complete	
Commence SFP Instrumentation Procurement	2Q13	Complete	
Complete SFP Instrumentation Design	3Q13	Started	4Q13
SFP Instrumentation Delivery	2Q14	Not Started	
Begin SFP Instrumentation Installation	3Q14	Not Started	
Commissioning of SFP Instrumentation	1Q15	Not Started	
NRC Order Implementation Date (based on the scheduled end of the second refueling outage after implementation plan submittal)	Spring 2015	Not Started	

4 Changes to Compliance Method

There are no changes to the compliance method as documented in the OIP (Reference 1).

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

FENOC expects to comply with the order implementation date. Relief/relaxation is not required at this time.

6 Open Items from Overall Integrated Plan and Draft Safety Evaluation

None.

7 Potential Draft Safety Evaluation Impacts

There are no potential impacts to the draft safety evaluation identified at this time.

8 References

The following references support the updates to the OIP described in this attachment.

1. FirstEnergy Nuclear Operating Company's (FENOC's) Overall Integrated Plan in Response to March 12, 2012 Commission Order Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 27, 2013.
2. NRC Order Number EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation, dated March 12, 2012.