



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

July 17, 2014

Mr. Eric A. Larson, Site Vice President  
FirstEnergy Nuclear Operating Company  
Beaver Valley Power Station  
Mail Stop A-BV-SEB1  
P.O. Box 4, Route 168  
Shippingport, PA 15077

SUBJECT: BEAVER VALLEY POWER STATION UNITS 1 AND 2 - RELAXATION OF RESPONSE DUE DATE REGARDING FLOODING HAZARD REEVALUATIONS FOR RECOMMENDATION 2.1 OF THE NEAR-TERM TASK FORCE REVIEW OF THE INSIGHTS FROM THE FUKUSHIMA DAI-ICHI ACCIDENT (TAC NOS. MF3589 AND MF3590)

Dear Mr. Larson:

By letter dated March 12, 2012,<sup>1</sup> the U.S. Nuclear Regulatory Commission (NRC) issued a request for information pursuant to Title 10 of the *Code of Federal Regulations*, Section 50.54(f) (henceforth referred to as the 50.54(f) letter). The NRC issued the request as a part of implementing lessons-learned from the accident at the Fukushima Dai-ichi nuclear power plant. Enclosure 2 to the 50.54(f) letter requested licensees to perform a reevaluation of all external flooding hazards using present-day guidance and methodologies.

By letter dated May 11, 2012,<sup>2</sup> the NRC issued a prioritization of due dates for responses from all sites. The flooding hazard reevaluation report (FHRR) was due on March 12, 2014, for Beaver Valley Power Station (BVPS) Units 1 and 2.

By letter dated December 17, 2013,<sup>3</sup> FirstEnergy Nuclear Operating Company (FENOC, the licensee) requested NRC assistance in obtaining the U.S. Army Corps of Engineers (USACE) analysis of dams that could impact the flood levels at the BVPS site. By letter dated March 11, 2014,<sup>4</sup> FENOC requested a delay in submittal of the FHRR for BVPS Units 1 and 2 to within 6 months of receiving the USACE final analysis. The reason for this request is that the USACE analysis is necessary to complete the flooding hazard reevaluation (FHR) and 6 months is necessary to incorporate the results.

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<sup>1</sup> The 50.54(f) letter is available in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML12053A340.

<sup>2</sup> The prioritization letter is available in ADAMS under Accession No. ML12097A509.

<sup>3</sup> The request for assistance in obtaining USACE analysis is available in ADAMS under Accession No. ML13353A566.

<sup>4</sup> The extension request from FENOC is available in ADAMS under Accession No. ML14070A371.

The NRC reviewed the justification provided by the licensee and considered the following factors when reviewing the new schedule:

- As stated in the March 11, 2014, letter, FENOC noted that an updated analysis modeled the BVPS site configuration from April 2012 and the current design basis for the local intense precipitation event. This analysis verified that the combination of site configuration changes since the original analyses have not adversely affected the current design basis. In addition, FENOC has completed walkdowns of the BVPS site and verified that existing flood barriers and protection features comply with current BVPS flooding licensing basis. The BVPS current licensing basis is met.
- As stated in the NRC's interim staff guidance (ISG) JLD-ISG-2013-01, "Guidance for Assessment of Flooding Hazards Due to Dam Failure," dated July 29, 2013,<sup>5</sup> evaluating flooding hazards for nuclear power plants needs to include consideration of floods resulting from dam failures. The FHR for BVPS Units 1 and 2 needs to consider dams that are operated by various government agencies including the USACE. The NRC has entered into an interagency agreement with the USACE to provide the necessary information for FENOC. Therefore, the FHRR for BVPS Units 1 and 2 cannot be completed until the NRC provides the analysis of the USACE dams to the licensee.
- As stated in the NRC's letter dated March 1, 2013,<sup>6</sup> "incomplete hazard reports that only contain an analysis of some flooding hazard mechanisms would not be of substantive benefit for staff and would not be acceptable." Therefore, the licensee must incorporate the information requested from the USACE before a FHRR can be acceptably submitted to the NRC in compliance with the request in the 50.54(f) letter.
- In the March 11, 2014, extension request FENOC provided a rationale for the extension. By letter dated April 24, 2014,<sup>7</sup> in response to an NRC request for additional information FENOC provided a Gantt chart that included a detailed timeline for integrating various aspects of the FHR. This Gantt chart was discussed with FENOC in a public meeting held on June 6, 2014.<sup>8</sup> The Gantt chart provides a detailed schedule and milestones to be completed in order for FENOC to provide a FHRR 6 months after receiving the USACE results.

Given these considerations, the NRC considers the revised schedule proposed by FENOC to be acceptable. Accordingly, and based upon the authority granted to the Director, Office of Nuclear Reactor Regulation, the revised required response date for submitting the FHRR for BVPS Units 1 and 2 is 6 months after FENOC receives the USACE final analysis. The NRC will

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<sup>5</sup> JLD-ISG-2013-01 is available in ADAMS under Accession No. ML13151A153.

<sup>6</sup> NRC's March 1, 2013, letter is available in ADAMS under Accession No. ML13044A561.

<sup>7</sup> The April 24, 2014, request for additional information response is available in ADAMS under Accession No. ML14115A156.

<sup>8</sup> The notice for the June 6, 2014, meeting can be found in ADAMS under Accession No. ML14148A490.

E. Larson

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include the date when the BVPS Units 1 and 2 FHRR is due when the requested USACE information is transmitted to the licensee. The transmittal letter will also note that if the USACE analysis results in a higher flood hazard relative to the design basis, the NRC staff will request that within 60 days of receipt of the USACE analysis FENOC provide interim actions it will take or plans to take to address the higher flooding hazard.

If you have any questions regarding this matter, or if it is necessary to revise the submittal schedule, please contact your NRC project manager, Jeffrey Whited, at (301) 415-4090 or by e-mail at [Jeffrey.Whited@nrc.gov](mailto:Jeffrey.Whited@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel H. Dorman". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Daniel H. Dorman, Acting Director  
Office of Nuclear Reactor Regulation

Docket Nos. 50-334 and 50-412

cc: Listserv

include the date when the BVPS Units 1 and 2 FHRR is due when the requested USACE information is transmitted to the licensee. The transmittal letter will also note that if the USACE analysis results in a higher flood hazard relative to the design basis, the NRC staff will request that within 60 days of receipt of the USACE analysis FENOC provide interim actions it will take or plans to take to address the higher flooding hazard.

If you have any questions regarding this matter, or if it is necessary to revise the submittal schedule, please contact your NRC project manager, Jeffrey Whited, at (301) 415-4090 or by e-mail at [Jeffrey.Whited@nrc.gov](mailto:Jeffrey.Whited@nrc.gov).

Sincerely,

*/RA/*

Daniel H. Dorman, Acting Director  
Office of Nuclear Reactor Regulation

Docket Nos. 50-334 and 50-412

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