



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

January 20, 2015

MEMORANDUM TO: Meena K. Khanna, Chief  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

FROM: Jeffrey A. Whited, Project Manager *Jeffrey A. Whited*  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

SUBJECT: BEAVER VALLEY POWER STATION, UNITS 1 AND 2, DRAFT  
REQUEST FOR ADDITIONAL INFORMATION (TAC NOS. MF2942  
AND MF2943)

The enclosed draft request for additional information (RAI) was transmitted on December 12, 2014, to Mr. Phil Lashley of FirstEnergy Nuclear Operating Company (FENOC, the licensee). This information was transmitted to facilitate a conference call in order to clarify the licensee's amendment request for Beaver Valley Power Station (BVPS), Units 1 and 2 dated October 18, 2013. The proposed amendment would modify the BVPS Technical Specifications by relocating specific surveillance frequencies to a licensee controlled program with the implementation of Nuclear Energy Institute (NEI) 04-10, "Risk-Informed Technical Specifications Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies."

The draft RAI was sent to FENOC to ensure that the questions are understandable, the regulatory basis for the questions is clear, and to determine if the information was previously docketed. This memorandum and the enclosure do not convey or represent an NRC staff position regarding the licensee's request.

Docket Nos. 50-334 and 50-412

Enclosure:  
Draft RAI

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DRAFT

REQUEST FOR ADDITIONAL INFORMATION

OFFICE OF NUCLEAR REACTOR REGULATION

REQUEST FOR ADDITIONAL INFORMATION RELATED TO AN AMENDMENT TO ADOPT

TECHNICAL SPECIFICATIONS TASK FORCE TRAVELER TSTF-425

TO RELOCATE SPECIFIC SURVEILLANCE FREQUENCIES TO A

LICENSEE CONTROLLED PROGRAM

BEAVER VALLEY POWER STATION – UNITS 1 AND 2

DOCKET NO. 50-344 AND 50-412

By letter dated October 18, 2013,<sup>1</sup> as supplemented by letters dated June 26, 2014,<sup>2</sup> and September 21, 2014,<sup>3</sup> FirstEnergy Nuclear Operating Company (the licensee) submitted a license amendment request for Beaver Valley Power Station (BVPS) Units 1 and 2. The proposed amendment would modify the BVPS Technical Specifications by relocating specific surveillance frequencies to a licensee controlled program with the implementation of Nuclear Energy Institute (NEI) 04-10, "Risk-Informed Technical Specifications Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies," (TSTF-425). To complete its review, the Nuclear Regulatory Commission staff requests a response to the question below.

BACKGROUND

The licensee's current TS SR 3.3.2.6 is associated with the Engineered Safety Features Actuation System (ESFAS) instrumentation. The surveillance requires that Slave Relay Test shall be performed once every 18 months for Unit 1 and once every 92 days for Unit 2 operations, OR for Unit 2 only once every 12 months per a NOTE in the surveillance frequency which states, "Only applicable to Unit 2 provided a satisfactory contact loading analysis has been completed, and a satisfactory slave relay service life has been established, for the slave relay being tested."

The licensee's proposed change as shown on TS page 3.3.2-6 in Attachment 2 of the application relocates the SR 3.3.2.6 frequency to the licensee's SFCP.

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1 Agencywide Documents Access and Management System (ADAMS) Accession No. ML13295A006.

2 ADAMS Accession No. ML14177A514.

3 ADAMS Accession No. ML14265A158.

## DISCUSSION

The staff noticed that NOTE in SR 3.3.2.6 frequency is a specific condition to BVPS Unit 2 operations only. It is a frequency that is related to specific conditions or conditions for the performance of the surveillance requirement. As such, it is an exception to the SFCP. Therefore, the surveillance frequencies and associated NOTE for Unit 2 operations need to be retained in TSs.

### RAI 8:

Please submit revised TS page for SR 3.3.2.6 change, otherwise submit a request for NRC permission to remove the condition with applicable justification for the NRC staff's review and approval.

### Regulatory Basis

The regulations under 10 CFR 50.36 (c)(2)(i) state that Limiting Conditions for Operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility (emphasis added). When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the TSs until the condition can be met.

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**ACCESSION NO.: ML15016A439**

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