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**Paul A. Harden**  
Sr. Vice President & Chief Operating Officer

330-436-1360

March 22, 2016  
L-16-085

10 CFR 50.90

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-73  
Davis-Besse Nuclear Power Station, Unit No. 1  
Docket No. 50-346, License No. NPF-3  
Request for Additional Information Response Related to Modification of Technical Specification 5.3.1, "Unit Staff Qualifications," (CAC Nos. MF7118, MF7119, and MF7120)

By letter dated November 19, 2015 (Accession No. ML15323A138), the FirstEnergy Nuclear Operating Company (FENOC) submitted to the Nuclear Regulatory Commission (NRC) a license amendment request for the Beaver Valley Power Station, Units No. 1 and No. 2 (BVPS) and the Davis-Besse Nuclear Power Station, Unit No. 1 (DBNPS). The proposed amendment would revise Technical Specification (TS) 5.3.1, "Unit Staff Qualifications," at both BVPS and DBNPS, by incorporating an exception to ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel," that would require licensed operators to comply with the requirements of 10 CFR 55, "Operators' Licenses" in lieu of the ANSI standard.

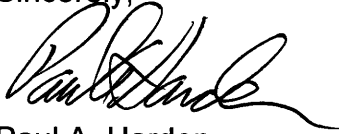
By e-mail dated February 29, 2016, the NRC staff requested additional information on the proposed amendment to complete its review. The responses to the request for additional information (RAI) are contained in the attachment.

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Thomas A. Lentz, Manager - Fleet Licensing, at (330) 315-6810.

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Davis-Besse Nuclear Power Station, Unit No. 1  
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I declare under penalty of perjury that the foregoing is true and correct. Executed on March 22, 2016.

Sincerely,



Paul A. Harden

Attachments:

1. Response To Request For Additional Information
2. Technical Specification Pages Re-typed with Proposed Changes Incorporated (For Information Only)

cc: NRC Region I Administrator  
NRC Region III Administrator  
NRC BVPS Resident Inspector  
NRC DBNPS Resident Inspector  
NRC BVPS Project Manager  
NRC DBNPS Project Manager  
NRC FENOC Project Manager  
Director, Pennsylvania Bureau of Radiation Protection, Department of Environmental Protection  
Beaver Valley Power Station Safety Specialist, Division of Nuclear Safety, Pennsylvania Bureau of Radiation Protection, Department of Environmental Protection  
Executive Director, Ohio Emergency Management Agency, State of Ohio (NRC Liaison)  
Utility Radiological Safety Board (Ohio)

Response to Request For Additional Information  
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By letter dated November 19, 2015 (Accession No. ML15323A138), the FirstEnergy Nuclear Operating Company (FENOC) submitted to the Nuclear Regulatory Commission (NRC) a license amendment request for the Beaver Valley Power Station, Units No. 1 and No. 2 (BVPS) and the Davis-Besse Nuclear Power Station, Unit No. 1 (DBNPS). The proposed amendment would revise Technical Specification (TS) 5.3.1, "Unit Staff Qualifications," at both BVPS and DBNPS, by incorporating an exception to ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel," that would require licensed operators to comply with the requirements of 10 CFR 55, "Operators' Licenses" in lieu of the ANSI standard.

By an e-mail dated February 29, 2016, the NRC staff requested additional information to complete its review. The requested information is provided below. The NRC staff question is in bold, followed by the FENOC response.

**Question 1:**

**The proposed line item added to TS 5.3.1 uses language that varies from precedent set by other plants (For example, Braidwood, Clinton, Dresden, LaSalle, Limerick, and Quad Cities all specify that the operators need to comply "only" with the requirements of 10 CFR 55). The proposed addition to the TS omits the word "only" which may lead to inconsistent interpretations by some operators. Please provide a justification for why the word "only" has been left out of the proposed change or revise the TS accordingly to ensure that operators will interpret it appropriately.**

Response:

The word "only" will be incorporated into the BVPS and DBNPS Technical Specification 5.3.1. Refer to Attachment 2.

Attachment 2  
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Technical Specification Pages Re-typed with Proposed Changes Incorporated  
(For Information Only)  
(Two pages follow)

## 5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

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5.3.1 Each member of the unit and radiation protection staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the following:

- The operations manager as specified in Specification 5.2.2.e,
- The radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and
- The technical advisory engineering representative who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and response analysis of the plant for transients and accidents.
- The licensed operators who shall comply only with the requirements of 10 CFR 55.

5.3.2 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed Reactor Operator (RO) are those individuals who, in addition to meeting the requirements of Specification 5.3.1, perform the functions described in 10 CFR 50.54(m).

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### 5.3 Unit Staff Qualifications

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5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the radiation protection manager, the operations manager, and licensed operators. The radiation protection manager shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. The operations manager shall be qualified as required by Specification 5.2.2.e. The licensed operators shall comply only with the requirements of 10 CFR 55.

5.3.2 For the purpose of 10 CFR 55.4, a licensed Senior Operator and a licensed Operator are those individuals who, in addition to meeting the requirements of Specification 5.3.1, perform the functions described in 10 CFR 50.54(m).

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