

Donald A. Moul
President & CNO
FirstEnergy Solutions Generation Companies

330-315-6800

May 2, 2018
L-18-125

10 CFR 73.5

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
Docket No. 50-346, License No. NPF-3
Perry Nuclear Power Plant
Docket No. 50-440, License No. NPF-58
Response to Follow-up Request for Additional Information Regarding Exemption
Request for a Physical Barrier Requirement
[EPID-L-2017-LLE-0019 (CAC Nos. 000976/05000334/L-2017-LLE-0019 MG0010,
000976/05000334/L-2017-LLE-0019 MG0011, 000976/05000334/L-2017-LLE-0019
MG0012, and 000976/05000334/L-2017-LLE-0019 MG0013)]

By letter dated July 19, 2017 (Accession Number ML17200D139), FirstEnergy Nuclear Operating Company (FENOC) requested a permanent exemption from a requirement of 10 CFR 73.2, "Definitions" for Beaver Valley Power Station Unit Nos. 1 and 2, Davis-Besse Nuclear Power Station, and Perry Nuclear Power Plant.

By e-mail dated February 9, 2018, the Nuclear Regulatory Commission (NRC) identified a request for additional information (RAI) to complete its review of the FENOC request. The FENOC response to the NRC RAI was provided in FENOC letter dated March 16, 2018 (Accession Number ML18078A033). In a subsequent e-mail dated April 12, 2018, the NRC indicated that additional information was required for one of the FENOC responses. The FENOC response to the follow-up request is attached to this letter.

Beaver Valley Power Station, Unit Nos. 1 and 2
Davis-Besse Nuclear Power Station
Perry Nuclear Power Plant
L-18-125
Page 2

There are no regulatory commitments contained in this submittal. If there are any questions or if additional information is required, please contact Mr. Thomas A. Lentz, Manager - Nuclear Licensing & Regulatory Affairs, at 330-315-6810.

Sincerely,



Donald A. Moul

Attachment:
Response to Request for Additional Information

cc:
NRC Region I Administrator
NRC Region III Administrator
NRC Resident Inspector – Beaver Valley
NRC Resident Inspector – Davis-Besse
NRC Resident Inspector – Perry
NRC Project Manager – FENOC Fleet
Director BRP/DEP
Site BRP/DEP Representative
Utility Radiological Safety Board

Attachment
L-18-125

Response to Request for Additional Information
Page 1 of 1

The NRC staff's request for additional information is provided in bold text, followed by the FENOC response.

Follow-up RAI #1:

Provide the technical basis or reason for the required physical separation clearance as it relates to the angular requirement for fence brackets. What impact does the required 45 degree to 30 degree angular requirement have on the operational effectiveness of the Intrusion Detection System?

Response:

Security (physical barrier) fencing and an intrusion detection system (IDS) surround the Davis-Besse Nuclear Power Station (DBNPS) protected area. The security fencing is installed inside of the IDS. At two locations the security fence and the IDS are in close proximity to each other. This is illustrated on page 5 of the Attachment to FENOC letter dated March 16, 2018. The security fences are topped with barbed wire or similar material that is supported by brackets that, if angled outward, may interfere with the IDS. Evaluation of this condition has concluded that angling the brackets outward would intrude into the fourth and fifth row of IDS wires and cause a significant reduction in field sensitivity and a resultant decrease in intrusion detection capability. This may also affect the field sensitivity of the sixth and seventh row of IDS wires and the respective intrusion detection capability including the elevation above the seventh row. Angling the brackets in an outward direction may also increase the number of false alarms due to possible movement of the angled brackets and the attached barbed wire.