



Beaver Valley Power Station  
Route 168  
P.O. Box 4  
Shippingport, PA. 15077-0004

February 1, 2021  
L-21-063

Ms. Sharon Carr  
Department of Environmental Protection  
Bureau of Environmental Cleanup and Brownfields  
Storage Tank Section  
Southwest Regional Office  
400 Waterfront Drive  
Pittsburgh, PA 15222

**SUBJECT:**

Beaver Valley Power Station, Facility ID 04-13361, Unit 2 Emergency Diesel Generator Day Tanks

The information contained in this letter is provided in response to the Pennsylvania Department of Environmental Protection's request during the January 27, 2021 virtual meeting concerning the Beaver Valley Power Station, Unit 2 (BVPS-2) emergency diesel generator day tanks 009 and 0010.

When a potential station modification is identified, a series of rigorous processes are followed to ensure procedural and regulatory requirements are identified and dispositioned in accordance with station procedures. Generally, these processes include identification of outage modifications at least 15 months in advance of a planned outage, presentation to our station Plant Health Committee requesting endorsement of the modification, allocation of funding, development of the engineering design change, planning and finally implementation.

Time requirements contained in the BVPS-2 Renewed Facility Operating License NPF-73 issued by the NRC dictate that while operating, one emergency diesel generator cannot be removed from service for longer than a specified duration. Although the described design modification has not been finalized, it is believed that implementation of the modification would exceed the duration permitted by the BVPS-2 Technical Specifications and would require the plant to be in shutdown. To avoid an unnecessary plant shutdown, the station intends to complete this design modification during a planned outage.

BVPS has taken the following steps to begin this process for the installation of emergency vents on the BVPS-2 emergency diesel generator day tanks as required by 25 Pa. Code Chapter 245. BVPS has consulted with an engineering firm and requested a proposal for Engineering services to perform the detailed design work for the modification and has consulted with a certified tank inspector on the required scope to

ADD  
NRR

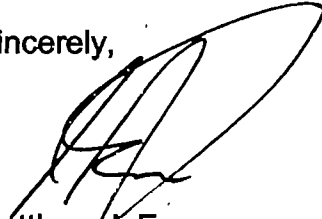
Beaver Valley Power Station, Unit No. 2  
L-21-063  
Page 2

achieve compliance. A presentation to the Plant Health Committee is being scheduled to endorse making this design modification.

BVPS appreciates the Department's flexibility as it navigates this matter and looks forward to working with the Department to resolve this issue.

Should you have any questions regarding this matter, please direct them to Amy Savage, at 724-682-7359.

Sincerely,



Matthew J. Enos  
General Plant Manager

cc: ~~Document Control Desk US NRC~~ (NOTE: No new US NRC commitments are contained in this letter.)




# REGULATORY CORRESPONDENCE CHECKLIST

Letter Number/Subject: L-21-063

**The reviewers of this correspondence signify the review of the items on the checklist by placing initials in the boxes below. As necessary, explain deviations, exceptions and non-applicable items in the Comments sections provided.**

**A. Peer Review:**

No.	Item Checked	Initials
1.	Correct organizations are listed on the review and routing forms, including organizations providing statements of fact.	DL
2.	References to Codes and Standards are accurate and in sufficient detail.	DL
3.	Subject line of an NRC cover letter references the NRC TAC number, if applicable.	N/A
4.	The letter number has been entered on the letter and subsequent pages.	DL
5.	Format and presentation are consistent with NORM-LP-4003 and any deviations justified.	DL
6.	Pages containing information pursuant to 10 CFR 2.390 are appropriately marked.	N/A
7.	Oath or affirmation (if required) – unsworn declaration is present.	N/A
8.	Dates are correct and consistent throughout the submittal.	DL
9.	Grammar, spelling and editorial presentation have been verified to be correct.	DL
10.	All applicable parts of the submittal are present (e.g. letter, enclosures, attachments, affidavits).	DL
11.	If Regulatory Commitments are included in NRC correspondence, the regulatory commitments are re-stated on an attachment (Regulatory Commitment List) to the submittal and identified for ownership on the Regulatory Correspondence Review Form (NOP-LP-4007-01). If no regulatory commitments are included in NRC correspondence, a statement to that effect is provided in the correspondence. For non-NRC correspondence, no statement regarding regulatory commitments is necessary.	N/A
12.	The letter content is factually complete, is presented logically and supports conclusions reached.	DL
13.	Enclosures and attachments are appropriately identified and contain all the necessary information to support conclusion of the submittal without the need to obtain other reference material.	DL
14.	If action is requested of the NRC, the requested action date has been included with appropriate justification.	N/A
15.	If the letter is in response to NRC requests, there is a clear tie between each question/request and the associated response, and each question/request is completely and clearly answered in the response.	N/A
16.	References listed have been reviewed, are available, and support the information contained in the correspondence.	DL
17.	Statements of fact have been verified to be accurate.	DL
18.	Actions stated as being complete have been verified to be complete.	DL
19.	Submittal does not contain information that has a material effect on information previously submitted to the NRC in response to a Notice of Violation or other enforcement action (e.g., Davis-Besse head event) or may significantly affect the NRC's understanding of plant activities. If it does, expedited communication paths with the NRC have been determined.	N/A

Review Performed By (Print Name and Sign): Dennis Lebec  Date: 2/2/21

Comments:

# REGULATORY CORRESPONDENCE CHECKLIST

NOP-LP-4007-02 Rev. 02

Page 2 of 2

Letter Number/Subject: L-21-063

## B. Cognizant Manager Review (Final Submittal Review Prior to Signature Authority):

No.	Item Checked	Initials
1.	Comments obtained during the review cycle have been resolved and incorporated within the applicable sections of the submittal. The submittal remains factual and complete.	<i>EG</i>
2.	Review signatures, or equivalent, have been obtained on Correspondence Review Forms (NOP-LP-4007-01).	<i>EG</i>
3.	The correspondence has been reviewed for regulatory commitments, licensing positions, prudence, appropriate wording, and potential regulatory impact.	N/A
4.	If the letter is in response to NRC questions or requests, there is a clear and complete response to each question or request and all questions have been satisfactorily addressed.	N/A

Review Performed By (Print Name and Sign): *Eli Gosby* *EG* Date: *2/3/21*  
 Comments: *NONE*

## C. Responsible Organization Review (Administrative Support Follow-up):

No.	Item Checked	Initials
1.	Date is on the letter and the letter has been put on the appropriate company letterhead.	<i>deg</i>
2.	Submittal cover letter is signed correctly.	<i>deg</i>
3.	Oath or Affirmation (if required) – unsworn declaration is present. If a notarized statement is requested by the signature authority, the statement page is signed and notarized.	NA
4.	When appropriate, initial notification and copy of submittal has been provided to the NRC via electronic mail.	NA
5.	Submittal has been mailed, or provided electronically (in accordance with NRC guidance on electronic submittals) to all appropriate recipients, with appropriate enclosures, attachments, etc.	<i>deg</i>
6.	Internal FENOC distribution is complete.	<i>deg</i>
7.	Regulatory Commitments have been documented in accordance with FENOC commitment management procedures.	NA
8.	Additional FENOC actions have been documented, as necessary, in appropriate activity tracking systems.	NA
9.	Correspondence documentation package is complete, and ready for future referral.	<i>deg</i>

Review Performed By (Print Name and Sign): *Denise Gentry* *Denise Gentry* Date: *2-4-21*  
 Comments: