



Beaver Valley Power Station
P.O. Box 4
Shippingport, PA 15077

John J. Grabnar
Site Vice President

724-682-5234
Fax: 724-643-8069

November 4, 2022
L-22-226

10 CFR 50.54(q)
10 CFR 72.44(f)

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
Part 72 Docket 72-1043
Beaver Valley Power Station Emergency Preparedness Plan

A revision to the Beaver Valley Power Station Emergency Preparedness Plan (EPP) was implemented on October 10, 2022. The change to the EPP was assessed under the requirements of 10 CFR 50.54(q) and was determined not to result in a reduction in the effectiveness of the EPP. The change continues to meet the applicable planning standards established in 10 CFR 50.47(b) and 10 CFR 50, Appendix E.

As required by 10 CFR 50.54(q)(5), this notification is being submitted within 30 days of implementation of the EPP change and the attachment to this submittal includes a summary analysis of the change.

This submittal also satisfies the reporting requirements associated with 10 CFR 72.44(f), which stipulates that within six months after any change is made to the EPP, the licensee shall submit a report containing a description of the changes to the Director, Division of Spent Fuel Management, Office of Nuclear Material Safety and Safeguards.

There are no regulatory commitments contained in this submittal. If there are any questions or if additional information is required, please contact Mr. Steve Sawtschenko, Manager – Regulatory Compliance and Emergency Response, at (724) 682-4284.

Sincerely,

A handwritten signature in black ink, appearing to read "John J. Grabnar".

John J. Grabnar

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Attachment:

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Summary Analysis

cc: NRC Region I Administrator
NRC Resident Inspector
NRC Project Manager
Director, NRC Division of Spent Fuel Management, ONMSS
Director BRP/DEP
Site BRP/DEP Representative

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T. L. Mohny
J. Porterfield (w/o attachment)
S. Sawtschenko
D. M. Benyak
J. A. Hartig (w/o attachment)
H. E. Gilliam
EPP Clerk (w/o attachment)

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Procedures/Title

EPP-PLAN-SECTION-1, Definitions, Revision 29
EPP-PLAN-SECTION-4, Emergency Conditions, Revision 36
EPP-PLAN-SECTION-6, Emergency Measures, Revision 39
EPP-PLAN-SECTION-7, Emergency Facilities and Equipment, Revision 35
EPP-PLAN-SECTION-9, Re-Entry and Recovery, Revision 15
EPP-PLAN-APPENDIX-C, Emergency Implementing Procedures Listing, Revision 21
EPP-PLAN-APPENDIX-E, Corporate Policy Statement, Revision 19
EPP-PLAN-APPENDIX-H, BVPS ERO On-Shift Staffing Analysis Report, Revision 2

Description of Changes

EPP-PLAN-SECTION-1 Revision 29

1. Eliminated "Beaver Valley Emergency Response System" (BVERS) definition and abbreviation and renamed "ERONS.....Emergency Response Organization Notification System" as part of common Fleet procedures.
2. Step 2; Eliminated "EPIP.....Emergency Plan Implementing Procedure" from listing of abbreviations.

EPP-PLAN-SECTION-4 Revision 36

3. Replaced "Emergency Director" with "Emergency Coordinator" throughout the document.

EPP-PLAN-SECTION-6 Revision 39

4. Updated "Health Physics Manual" to "Radiation Protection Procedures" throughout the document.
5. In discussion of Dose Projection Capabilities, updated "These methods are described in detail in supporting technical documentation, and procedures for their use are included in the Emergency Implementing Procedures 1/2-EPP-IP-2.xx series," to "These methods are described in detail in supporting technical documentation and site procedures."
6. Section 6.5.3.2; In discussion of Liquid Release Dose Assessment Method, updated "The 1/2-EPP-IP-2.7 series provides a series of methods of assessing the radiological consequences of liquid releases to the Ohio River" to "Site Procedures provide methods of assessing the radiological consequences of liquid releases to the Ohio River."
7. Section 6.7.1.5; Changed "If necessary, search and rescue efforts will commence in accordance with Emergency Implementing Procedures" to "If necessary, search and rescue efforts will commence in accordance with Site Procedures."

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8. Changed "Emergency Implementing Procedures provide guidance for accelerated or additional bioassays...." to "Radiation Protection Procedures provide guidance for accelerated or additional bioassays...."
9. Changed "Three exceptions to normal respiratory protection practices may be authorized by the Emergency Coordinator with the advice of the Radiation Protection Coordinator, in accordance with the provisions of Emergency Implementing Procedures" to "Three exceptions to normal respiratory protection practices may be authorized by the Emergency Coordinator with the advice of the Radiation Protection Coordinator, in accordance with the provisions of Site Procedures."
10. Section 6.7.2.5; Changed "The plant system status indicators and the protective actions associated with each indicator, as provided in 1/2-EPP-IP-4.1, "Offsite Protective Action," are based on..." to "The plant system status indicators and the protective actions associated with each indicator, as provided in the Emergency Implementing Procedures, are based on..."
11. Section 6.8; Changed "Established Emergency Plan Implementing Procedures, Operating Procedures and Radiation Control Procedures provide for personnel decontamination and for assistance to injured persons..." to "Established Operating Procedures and Radiation Control Procedures provide for personnel decontamination and for assistance to injured persons..."
12. Section 6.3.3; Updated title of Communications & Records Coordinator.

EPP-PLAN-SECTION-7 Revision 35

13. Section 7.1; Revised "The significant instrumentation and communications available at each of the BVPS emergency facilities are listed in the Implementing Procedures" to "...are listed in Site Procedures."
14. Step 7.1.4.1; Revised "Multiple communication types and paths are available in the facility and are described in the EOF implementing procedure," to "...in Site procedures."
15. Section 7.4.1; Replaced "Health Physics Manual" with "Radiation Protection Procedures."
16. Step 7.4.1.2; Revised "The selection of instruments and sampling media, and the methodology established in Emergency Implementing Procedures, provides for a minimum field detection capability...", to "...established in Site Procedures, provides..."
17. Removed section 7.6.3, "Remote Shelf Connection," stating "The Remote Shelf connection provides a similar communication link to the PAX from the EOF to the public telephone network," under the general heading of "Communications Systems."
18. Updated section 7.6.4 (renumbered to 7.6.3) wording from "The Emergency Telephone System (ETS) is a designated set of phones on the commercial phone system that DOES NOT go through either of the Beaver Valley Phone

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Switches but goes directly to Akron, Ohio for switching,” to “The Emergency Telephone System (ETS) is a designated set of phones that DOES NOT go through either of the Beaver Valley Phone Switches.” Removed the wording “The ETS operates in the same manner as the commercial phone systems when placing a long distance call. Simply lift the receiver, wait for a dial tone and dial “9” then “1” before dialing the ten digit phone number.””

19. Step 7.6.5 (renumbered to 7.6.4); Changed “There are six fixed base station transceivers associated with Beaver Valley Power Station” to “There are five fixed base station transceivers associated with Beaver Valley Power Station.” Removed “Pennsylvania State Police” as one of the base station transceivers associated with Beaver Valley Power Station. Changed “The communications links between the Control Room, the risk counties, and the State Police are tested weekly” to “The communications links between the Control Room and the risk counties are tested weekly.”
20. Updated section 7.6.6 (renumbered to 7.6.5) to reflect change of ERO notification system from “BVERS” to “ERONS”.
21. Section 7.7; Revised “Implementing Procedures provide guidance for emergency teams, and include locations for designated emergency equipment,” to “Site Procedures provide guidance...”

EPP-PLAN-SECTION-9 Revision 15

22. Revised Section 9.3 to include discussion of recovery as part of “Re-Entry” during the Recovery portion of an event.

EPP-PLAN-APPENDIX-C Revision 21

23. Updated listing of Implementing Procedures to reflect new Energy Harbor Fleet common Implementing Procedures.

EPP-PLAN-APPENDIX-E Revision 19

24. Reissued Site Vice President letters for “Letter of Authority” and “ERO Responsibilities and Requirements” signed by the current Site Vice President, with the following changes; “Emergency Director” to “Emergency Coordinator”; “Emergency Recovery Manager” to “Emergency Director”; Clarified that the Emergency Director has overall authority beginning at the Alert classification level.

EPP-PLAN-APPENDIX-H Revision 2

25. To support implementation of changes implemented to the AOPs, EOPs, and EIPs as well as the proposed emergency plan on-shift staffing implemented with the proposed ERO staffing License Amendment Request, a review and revision of the on-shift staffing analysis was completed.

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Description of How the Change Still Complies with Regulations

As part of the implementation of the NRC approved license amendment and associated safety evaluation report relative to the Beaver Valley Emergency Response Organization (BEAVER VALLEY POWER STATION, UNIT NOS. 1 AND 2 – ISSUANCE OF AMENDMENT NOS. 315 AND 205 REGARDING CHANGES TO THE EMERGENCY PREPAREDNESS PLAN (EPID L-2020-LLA-0127)), common Implementing Procedures were developed for use between the three Energy Harbor nuclear sites. Beaver Valley Emergency Plan Implementing Procedures (EPIPs) were eliminated and replaced with common Fleet Nuclear Operating Procedures (the new Implementing Procedures). To ensure no reduction in effectiveness of the Emergency Plan Emergency Plan, requirements within the new Implementing Procedures, as well as any requirements moved to other station documents, continue to be evaluated under 10 CFR 50.54(q) when changes are made.

Section-1 changes are administrative, supporting implementation of the common Fleet Nuclear Operating Procedures (the new Implementing Procedures). Renaming the existing ERO notification system and eliminating the “EPIP” designation for Implementing Procedures has no effect on compliance with regulations.

Section-4 changes replace “Emergency Director” with “Emergency Coordinator” throughout the Emergency Conditions background document. This is a conforming change for the ERO position titles previously approved as part of Amendment Nos. 315 and 205 regarding changes to the Emergency Preparedness Plan.

Section-6 changes update references within the Emergency Plan to reflect the new location of information, based on the conversion of site-specific EPIPs to Energy Harbor common Implementing Procedures. Various BVPS site specific information was moved from EPIPs to other station documents, as identified in the Description of Changes. Additionally, references to the “Health Physics Manual” were updated to reference “Radiation Protection procedures”, based on changes to Radiation Protection procedure designations. These changes are administrative reference changes, with no effect on compliance with regulations associated with Emergency Measures. Updating the title of “Communications & Records Coordinator” is a conforming change for the ERO position titles previously approved as part of Amendments 315 and 205 regarding changes to the Emergency Preparedness Plan.

Section-7 changes include the description of the designation change for the ERO notification system from BVERS to ERONS, and reference changes from specific EPIPs to various site procedures, as discussed previously for Sections 1 and 6. The removal of discussion of a “Remote Shelve Connection” (change 17) supports a new private

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network deployed at Energy Harbor sites. The “Remote Shelve Connection” discussion was added when the EOF facility was moved from the onsite Emergency Response Facility to the current location outside of the Emergency Planning Zone and was a replacement for the private branch exchange located within the Emergency Response Facility. The Remote Shelve Connection was eliminated as part of the new private network. The updated telephone network for Energy Harbor provides a greater geographic resiliency and the local fail-over redundancy required for the Emergency Operations Facility. Capabilities and redundancy within the updated network model are maintained, and systems remain established for prompt communication among principal emergency response organizations and emergency response personnel, as required by the regulations. Adequate equipment continues to be maintained to support emergency response.

Change 18 updated the description of the Emergency Telephone System (ETS) to support a direct line upgraded to an independent cellular system that is no longer routed directly to Akron Ohio for switching. The new ETS system remains independent from the commercial telephone system, meeting the requirements for dissimilar vulnerability to assure contact with the NRC, in accordance with regulations.

The remaining changes to Section-7 (change 19) support the removal of a base radio transceiver from the Pennsylvania State Police (PSP) barracks. The PSP are listed in the Emergency Plan as one of several ‘local services support’ groups in the event of an emergency event. Methods available for contact include direct telephone communications with individual organizations and message relay through the Beaver County Emergency Services Center. The Beaver County Emergency Services Center serves as a central contact point in an emergency and maintains multiple capabilities for message relay to the PSP. As stated in the Emergency Plan, should additional resources be required to respond to the site for an emergency including a hostile action event, resources may be obtained by way of request through the Beaver County Emergency Management Agency (BCEMA) under the Pennsylvania Intrastate Mutual Aid System, the Beaver County Fire Mutual Aid Agreement, and the PA Region 13 Counter-terrorism Task Force. These communication capabilities remain in place. Compliance with the regulations within 10 CFR 50.47(b)(6) and 10 CFR 50.47(b)(8) requiring systems to be established for prompt communication among principal emergency response organizations, and for adequate equipment to be maintained to support emergency response, is maintained.

Section-9 changes update reference to a specific “Re-entry Emergency Implementing Procedure.” The new Energy Harbor common Implementing Procedure for Termination and Recovery details the termination and recovery process, the standard Recovery Organization, contains station and offsite recovery issues and strategies guidance, and recovery organization roles and responsibilities, and provides overall guidance to

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terminate an event and accomplish transition to the Recovery Phase. Specific re-entry requirements for plant personnel will depend on information obtained by recovery teams and present and future plant conditions. The identified changes continue to meet requirements as set forth in 10 CFR 50.47(b)(13), Recovery and Reentry Planning.

Appendix-C changes update the listing of Implementing Procedures as a result of the new Energy Harbor common Implementing Procedures. This is an administrative change only with no effect on compliance with applicable regulations.

Appendix-E and Appendix-H changes are conforming changes previously approved as part of Amendments 315 and 205 regarding changes to the Emergency Preparedness Plan. The changes update existing authority and responsibility documents to reflect the current Site Vice President and update the “Emergency Director” title changes.

Appendix-H updates the BVPS ERO On-Shift Staffing Analysis to Revision 2, completed in support of the license amendment. These changes do not affect compliance with applicable regulations.

Description of Why the Change is Not a Reduction in Effectiveness (RIE)

The removal of the discussion of a “Remote Shelve Connection” supports a new private telephone network deployed at Energy Harbor sites. The updated telephone network provides a greater geographic resiliency and the local fail-over redundancy required for the Emergency Operations Facility. Capabilities and redundancy within the updated network model are maintained, and systems remain established for prompt communication among principal emergency response organizations and emergency response personnel.

The updated description of the Emergency Telephone System (ETS) supports a direct line upgraded to an independent cellular system that is no longer routed directly to Akron Ohio for switching. The new ETS system remains independent from the commercial telephone system, meeting the requirements for dissimilar vulnerability to assure contact with the NRC. Redundant methods for NRC contact remain in place as a result of this change.

The removal of a base radio transceiver from the PSP barracks was the result of a relocation of the barracks. Multiple methods of contact of the State Police remain in place, including direct telephone communications and message relay through the Beaver County Emergency Services Center, which serves as a central contact point in an emergency and maintains multiple capabilities for message relay to the PSP.

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The remaining changes are either administrative or conforming in support of the NRC approved license amendment relative to the BVPS Emergency Response Organization (Amendment Nos. 315 and 205), and the conversion to common Implementing Procedures developed for use between the three Energy Harbor nuclear sites.

The EPP continues to meet the planning standards of 10 CFR 50.47(b) and the requirements in 10 CFR 50, Appendix E. The effectiveness of the BVPS Emergency Plan is considered to be maintained as a result of these revisions. These changes result in no reduction in emergency planning function, emergency planning capabilities, or emergency planning time requirements.