



FirstEnergy Nuclear Operating Company

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U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555-0001

**Subject: Beaver Valley Power Station (BVPS), Unit No. 1 and No. 2**  
**BV-1 Docket No. 50-334, License No. DPR-66**  
**BV-2 Docket No. 50-412, License No. NPF-73**  
**Request for Clarification of Safety Evaluation**

FENOC requests the NRC's safety evaluation (SE) related to Amendments 246 (BVPS Unit No. 1) and 124 (BVPS Unit No. 2) to the BVPS operating licenses be clarified. On January 24, 2002, the NRC issued Amendments 246 and 124 to the BVPS Unit No. 1 and 2 operating licenses. These amendments consisted of changes to the Unit 1 and 2 technical specifications in response to the BVPS License Amendment Request Numbers 287 and 159 dated March 28, 2001. The amendments approved relocation of various technical specifications to the Licensing Requirements Manuals and Offsite Dose Calculation Manual.

Following receipt of these amendments, BVPS personnel verbally notified the BVPS NRC Project Manager that the SE contained some statements that required clarification. Attachment 1 provides the SE statements that require clarification, the basis for the clarification and suggested revisions.

If there are any questions concerning this matter, please contact Mr. Larry R. Freeland, Manager, Regulatory Affairs/Corrective Action at 724-682-5284.

Sincerely,

Lew W. Myers

Attachment

c: Mr. D. S. Collins, Project Manager  
Mr. D. M. Kern, Sr. Resident Inspector  
Mr. H. J. Miller, NRC Region I Administrator  
Mr. D. A. Allard, Director BRP/DEP  
Mr. L. E. Ryan (BRP/DEP)

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## ATTACHMENT 1

### **Request to Clarify the Safety Evaluation (SE) for Beaver Valley Power Station (BVPS) Unit Nos. 1 And 2 Issued on January 24, 2002**

#### 1. Applicable SER Statement

In the first paragraph on page 2 of the Background section of the SE, the last sentence references NUREG-1431 as follows: NUREG-1431, Title 10 of the *Code of Federal Regulations* "Standard Technical Specifications - Westinghouse Plants."

##### a. Basis for Clarification

NUREG-1431 should be referenced as "Standard Technical Specifications - Westinghouse Plants." "Title 10 of the Code of Federal Regulations" is not normally a part of the reference to NUREG-1431.

##### b. Suggested Revision

Revise the sentence to read "NUREG-1431, "Standard Technical Specifications - Westinghouse Plants"."

#### 2. Applicable SER Statement

On page 4 of the SE under the heading "3.1.1 Boration Systems TSs", the SE states that "The licensee proposes to relocate the boration system requirements for the charging and the refueling water storage tank (RWST) (both operating and shutdown) from the CTS and to...."

##### a. Basis for Clarification

The RWST requirements for shutdown, not operating, will be relocated. The SE correctly states this in the following sentences by stating "The RWST portion of TS 3.1.2.8 is not proposed for relocation and will be retained in the TS."

##### b. Suggested Revision

Revise the sentence to read "The licensee proposes to relocate the boration system requirements for the charging (both operating and shutdown) and the refueling water storage tank (RWST) (shutdown) from the CTS and to...."

3. Applicable SER Statement

On page 5 of the SE the heading which states “CTS 3/4.4, “RCS Safety Valves – Shutdown” (Modes 5 and 6).

a. Basis for Clarification

CTS 3/4.4.4 pertains to RCS safety valves in Modes 4 and 5, not Modes 5 and 6, as represented in the section heading.

b. Suggested Revision

Revise heading to state “CTS 3/4.4, “RCS Safety Valves – Shutdown” (Modes 4 and 5).”

4. Applicable SER Statement

On page 5 of the SE under the heading which states “CTS 3/4.4, “RCS Safety Valves – Shutdown” (Modes 5 and 6), the SE states “In the CTS, the pressurizer safety valves are required to be operable in order to provide overpressure protection from operating conditions (Modes 1-3) down to the RCS temperature at which the overpressure protection system residual heat removal (RHR relief valves) is required to be operable. Therefore, the requirements of CTS 3.4.3, Safety Valves – Operating (in Modes 1-3), and CTS 3.4.9.3, Overpressure Protection System, provides continuous RCS overpressure protection.”

a. Basis for Clarification

In the CTS 3.4.9.3, Overpressure Protection System, the RHR relief valves are not required or relied upon for overpressure protection. The pressurizer power operated relief valves (PORVs) provide the required RCS overpressure protection. The BVPS RHR relief valves are not part of CTS 3.4.9.3. Technical Specification 3.4.3, as revised by this amendment, requires the pressurizer safety valves to be operable down to the RCS temperature at which the overpressure protection system PORVs are required to be operable.

b. Suggested Revision

Revise the sentence to read “In the CTS, the pressurizer safety valves are required to be operable in order to provide overpressure protection from operating conditions (Modes 1-3) down to the RCS temperature at which the overpressure protection system PORVs are required to be operable.”