

**Richard G. Mende**  
Director, Site Operations

724-682-7773

November 8, 2005  
L-05-173

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

**Subject: Beaver Valley Power Station, Unit Nos. 1 and 2  
BV-1 Docket No. 50-334, License No. DPR-66  
BV-2 Docket No. 50-412, License No. NPF-73  
Additional Information Regarding License Amendment Request  
Nos. 302 and 173 - Extended Power Uprate (EPU)**

FirstEnergy Nuclear Operating Company (FENOC) requested amendments to the above licenses in the form of changes to the Beaver Valley Power Station (BVPS) Operating Licenses and Technical Specifications. License Amendment Request Nos. 302 and 173, transmitted by FENOC letter L-04-125 dated October 4, 2004, proposed Operating License and Technical Specification (TS) changes that support an increase in the licensed power level from the current level of 2689 MWt to 2900 MWt Rated Thermal Power (RTP).

Enclosures 1 and 2, respectively, provide additional information regarding the BVPS Unit No. 2 Turbine Overspeed Analysis and the Reactor Vessel Internals Degradation Program. There are no technical changes proposed. The additional information contained in this transmittal have no impact on either the proposed Technical Specification changes or the no significant hazards consideration transmitted by FENOC letter L-04-125. Enclosure 3 provides a summary list of the regulatory commitments contained in this letter.

If you have questions or require additional information, please contact Mr. Gregory A. Dunn, Manager - Licensing, at 330-315-7243.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 8, 2005.

Sincerely,



Richard G. Mende

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Enclosures:

1. Beaver Valley Power Station (BVPS) Unit No. 2 Turbine Overspeed Analysis
2. Reactor Vessel Internals Inspection
3. Commitment List

c: Mr. T. G. Colburn, NRR Senior Project Manager  
Mr. P. C. Cataldo, NRC Senior Resident Inspector  
Mr. S. J. Collins, NRC Region I Administrator  
Mr. D. A. Allard, Director BRP/DEP  
Mr. L. E. Ryan (BRP/DEP)

## **L-05-173 Enclosure 1**

### **Beaver Valley Power Station (BVPS) Unit No. 2 Turbine Overspeed Analysis**

In FirstEnergy Nuclear Operating Company (FENOC) letter L-05-130 dated July 28, 2005, the response to Request for Additional Information (RAI) Question B.4 stated that when the Beaver Valley Power Station (BVPS) Unit No. 2 high pressure (HP) turbine replacement is installed, the overspeed analysis will be performed as part of the design change process to determine the acceptability of the turbine overspeed protection.

During a phone call on October 24, 2005, the NRC staff requested that FENOC provide a commitment to perform the BVPS Unit No. 2 turbine overspeed analysis to ensure the overspeed protection is acceptable. The following statements do not reflect any changes to FENOC intentions regarding the overspeed analysis, but are provided to establish the requested commitment.

Implementation of Extended Power Uprate for BVPS Unit No. 2 will require modification of the Unit 2 Turbine-Generator assembly. As required by FENOC design modification processes, appropriate turbine overspeed analysis will be performed to ensure overspeed protection is acceptable.

## **L-05-173 Enclosure 2**

### **Reactor Vessel Internals Inspection**

In FirstEnergy Nuclear Operating Company (FENOC) letter L-05-154 dated October 7, 2005, the response to Request for Additional Information (RAI) Question J.9 stated FENOC's intention to continue participation in the Electric Power Research Institute (EPRI) Materials Reliability Project (MRP) research initiatives on aging related degradation of reactor vessel internals components.

During a phone call on October 26, 2005, the NRC staff requested additional clarification and commitment regarding FENOC MRP participation and development of a reactor vessel internals aging management program. The following statements do not reflect any changes to FENOC intentions regarding these activities, but are provided to establish the requested commitment.

FirstEnergy Nuclear Operating Company (FENOC) is currently an active participant in the Electric Power Research Institute (EPRI) Materials Reliability Project (MRP) research initiatives on aging related degradation of reactor vessel internals components, and commits to the following:

- a. Continue its active participation in the MRP initiative to determine appropriate reactor vessel internals degradation management programs,
- b. Evaluate the recommendations resulting from this initiative and implement a reactor vessel internals degradation management program applicable to BVPS Unit Nos. 1 and 2,
- c. Incorporate the resulting reactor vessel internals inspections into the BVPS Unit Nos. 1 and 2 augmented inspection program, as appropriate.

## **L-05-173 Enclosure 3**

### **Commitment List**

The following list identifies those actions committed to by FirstEnergy Nuclear Operating Company (FENOC) for Beaver Valley Power Station (BVPS) Unit Nos. 1 and 2 in this document. Any other actions discussed in the submittal represent intended or planned actions by FENOC. They are described only as information and are not regulatory commitments. Please notify Mr. Gregory A. Dunn, Manager - Licensing, at 330-315-7243 of any questions regarding this document or associated regulatory commitments.

#### Commitment

As required by FENOC design modification processes, appropriate BVPS Unit No. 2 turbine overspeed analysis will be performed to ensure overspeed protection is acceptable.

#### Due Date

Prior to placing modified turbine in service.

FirstEnergy Nuclear Operating Company (FENOC) is currently an active participant in the Electric Power Research Institute (EPRI) MRP research initiatives on aging related degradation of reactor vessel internals components, and commits to the following:

Not Applicable

- a. Continue its active participation in the MRP initiative to determine appropriate reactor vessel internals degradation management programs,
- b. Evaluate the recommendations resulting from this initiative and implement a reactor vessel internals degradation management program applicable to BVPS Unit Nos. 1 and 2,
- c. Incorporate the resulting reactor vessel internals inspections into the BVPS Unit Nos. 1 and 2 augmented inspection program, as appropriate.