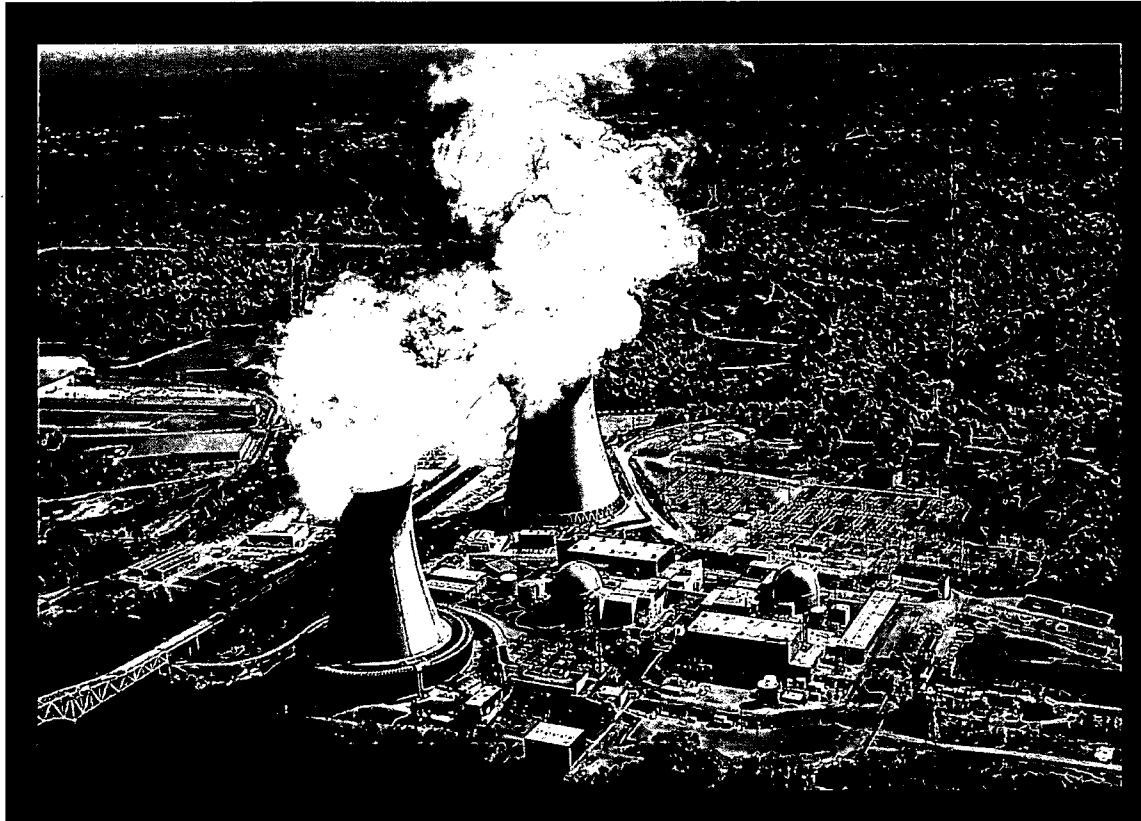


BEAVER VALLEY POWER STATION

License Renewal Application



**BVPS License
Renewal Project**

**Presentation to
NRC**

Aug. 2, 2007

Introduction

**Greg Halnon, Director Fleet
Regulatory Affairs**

AGENDA

- **Introduction – Greg Halnon**
- **2005 project review – Cliff Custer**
- **Current project overview – Cliff Custer**
- **Oversight – Greg Halnon**
- **Review Process – Cliff Custer**
- **Submittal items of interest – Cliff Custer**
- **Closing remarks – Pete Sena**

2005 Project Review

March 2005 NRC Letter:

- **Information - overly general**
- **Inadequate QA of renewal application**
- **Insufficient explanation of information**
 - Lack of non-safety related structures & components scoping
 - Technically incorrect information
 - LRA inconsistencies
- **Insufficient SAMA**

2005 Project Review

2005 Project: Root Causes:

- **Less than adequate participation in NRC & Industry Working Groups**
- **Inadequate regulatory interface**
- **Inadequate sponsorship & station ownership**

2005 Project Review

Major Lessons Learned:

- **FENOC must manage the project to remain current with industry and NRC standards**
- **Station personnel must own the results and be prepared to implement renewed licenses**
- **Improved management engagement and oversight are necessary**
- **LRA and support documents should be subjected to rigorous reviews by owner, third party and peers**

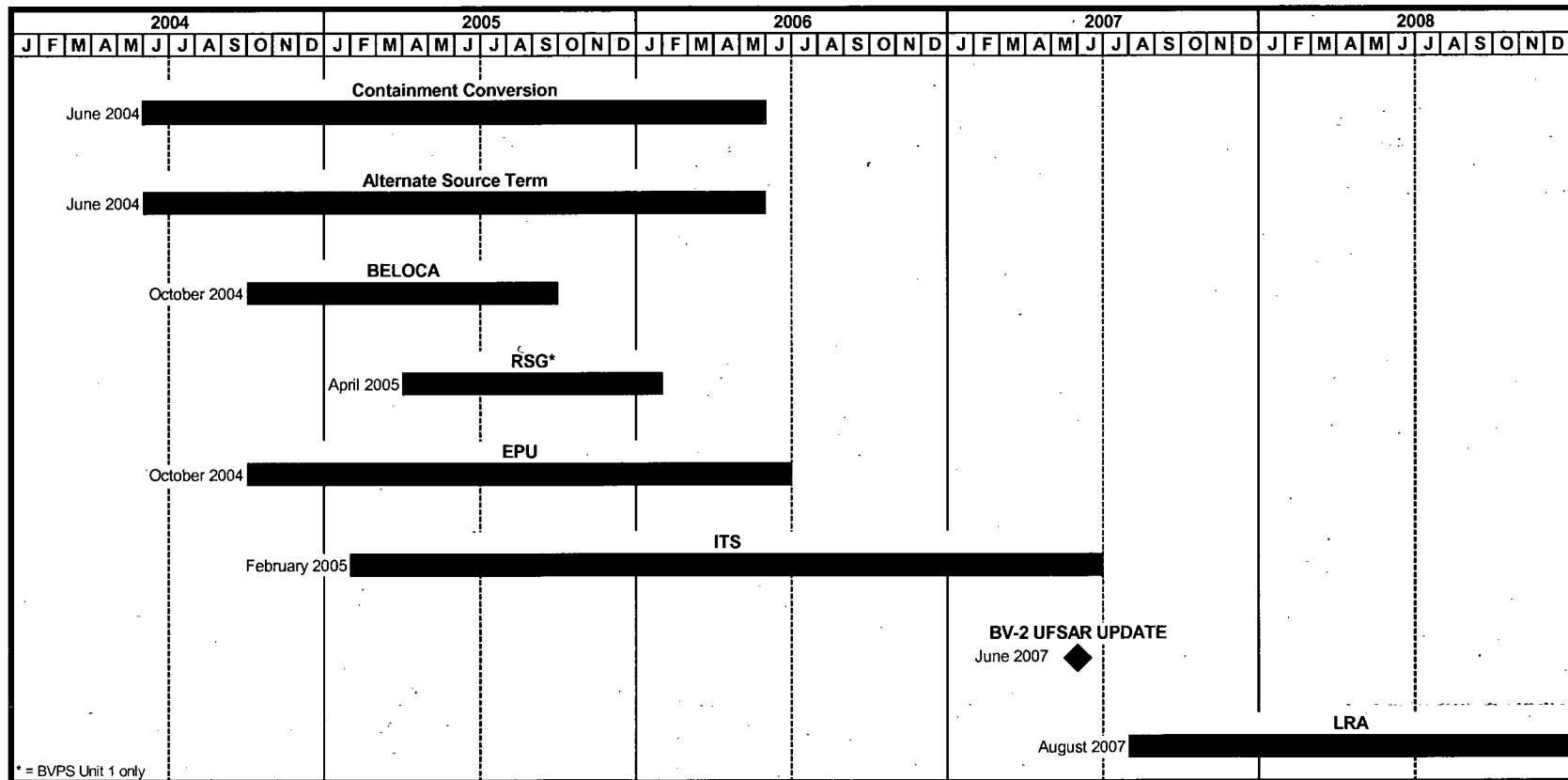
Current Project Overview

What's different this time?

- **Root Causes & Lessons Learned have been addressed**
- **Industry Participation to remain current with standards**
- **Site Participation & use of Site-Specific Operating Experience**
- **CLB items related to License Renewal identified & addressed**
- **Built-in Quality – Approval Structure, LRAB, Review Cycle (Internal/External Assessments)**

Current Project Overview

Current Licensing Basis Reconciliation



Current Project Overview

Site Participation:

- **Program evaluation documents & site operating experience**
- **Aging management review**
- **Specific TLAA updates & reviews**
- **SAMA**
- **Midland propane terminal evaluation**

Current Project Overview

Industry Participation & NRC Interface

2005	2006	2007
		Shearon Harris AMR Audit
Working Group, Audits & Inspections		
12	20	18
Millstone LRIWGM	Environmental Workshop	Wolf Creek AMP & TLAA Audit
NRC/ACRS Meetings		
11	11	5
NRC/NEI LRTF Meetings & Conf. Calls		
5	10	7
NRC & BVPS Specific Meetings		
3	~4	5

Industry Benchmarking Significance

- **LR Task Force & Working Groups**
 - Improved content
 - Adjustments to program documents
- **Audits**
 - Detailed adjustments to support documents and the application
 - Understanding of audit issues and logistics
- **Monthly NRC phone-calls & meetings**
 - Verify project actions are current
 - Current expectations for the Environmental Report

Response to Industry Participation & Lessons Learned (cont.)

- **Environmental report enhanced to address NRC concerns regarding:**
 - Clean Water Act 316 (b) information
 - Non-rad waste, waste minimization and the 1990 Pollution Prevention Act information
 - 1966 National Historic Preservation Act information
 - Endangered Species Act threatened and Endangered Species Review

Oversight

Summary:

- **Increased scrutiny from peer groups:**
 - NEI Working Group Reviews of Guidance
 - Peer reviews in self-assessments
 - 3rd Party sufficiency review
- **License Renewal Assessment Board**
- **Nuclear oversight - performance based assessments**
- **Management Review of progress and quality indicators**
- **Final Licensing and site reviews**

Oversight

LR Assessment Board Charter:

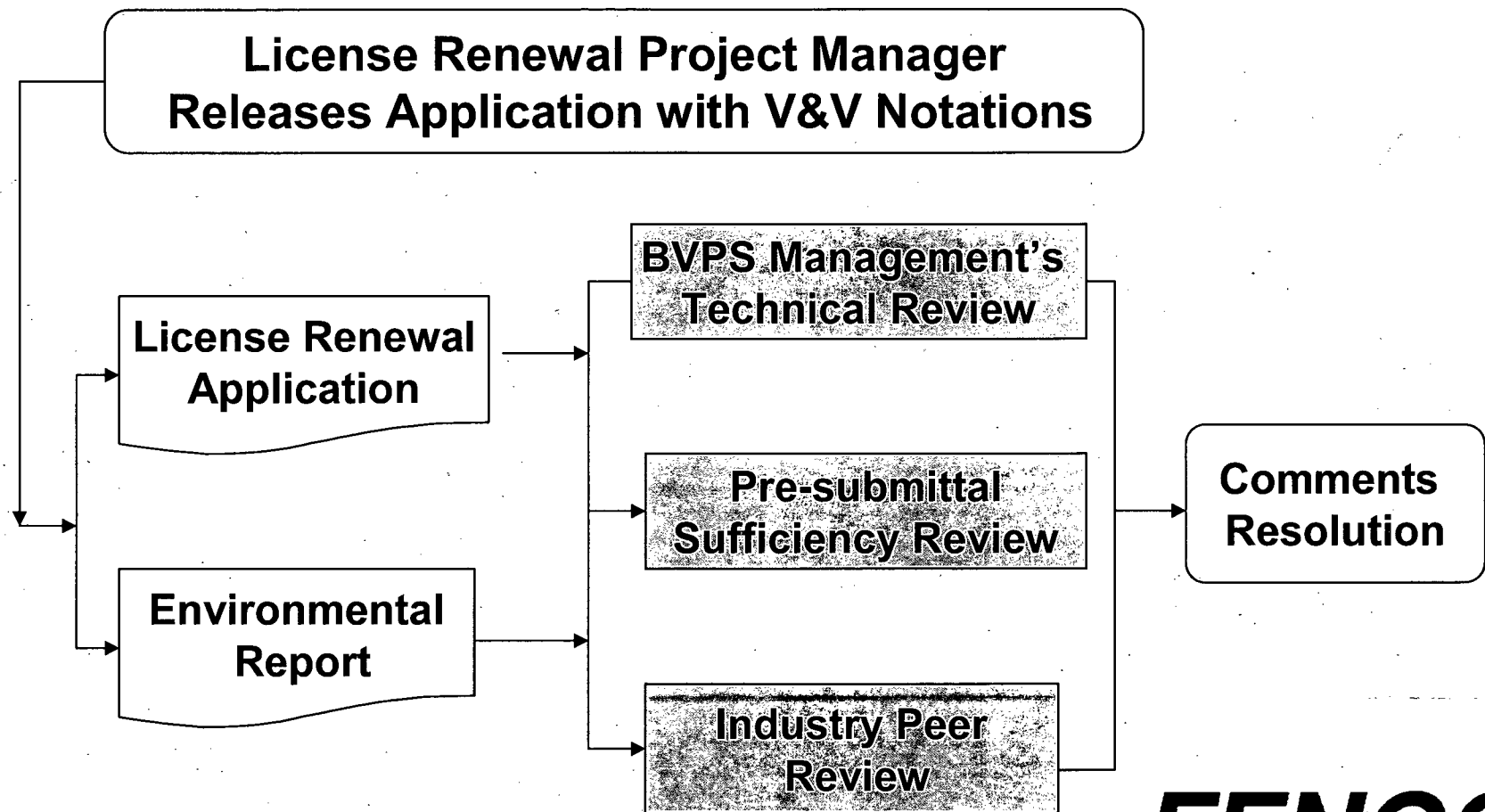
- **Diverse membership:**
 - FENOC corporate, BV Senior Leadership Team, plant experts, peers, industry experts, and legal advisor
- **Scope of review - Focused assessments and board meeting:**
 - Assessment results and recommendations
 - Project guidelines - current
 - Technical issues - consistent with Current Licensing Basis
 - Deviations from GALL or other standards
 - LRA acceptable (NRC/Industry Standards)
- **Timing for reviews:**
 - 5 Reviews at key milestone events
- **Board reports to BVPS site VP**

Oversight

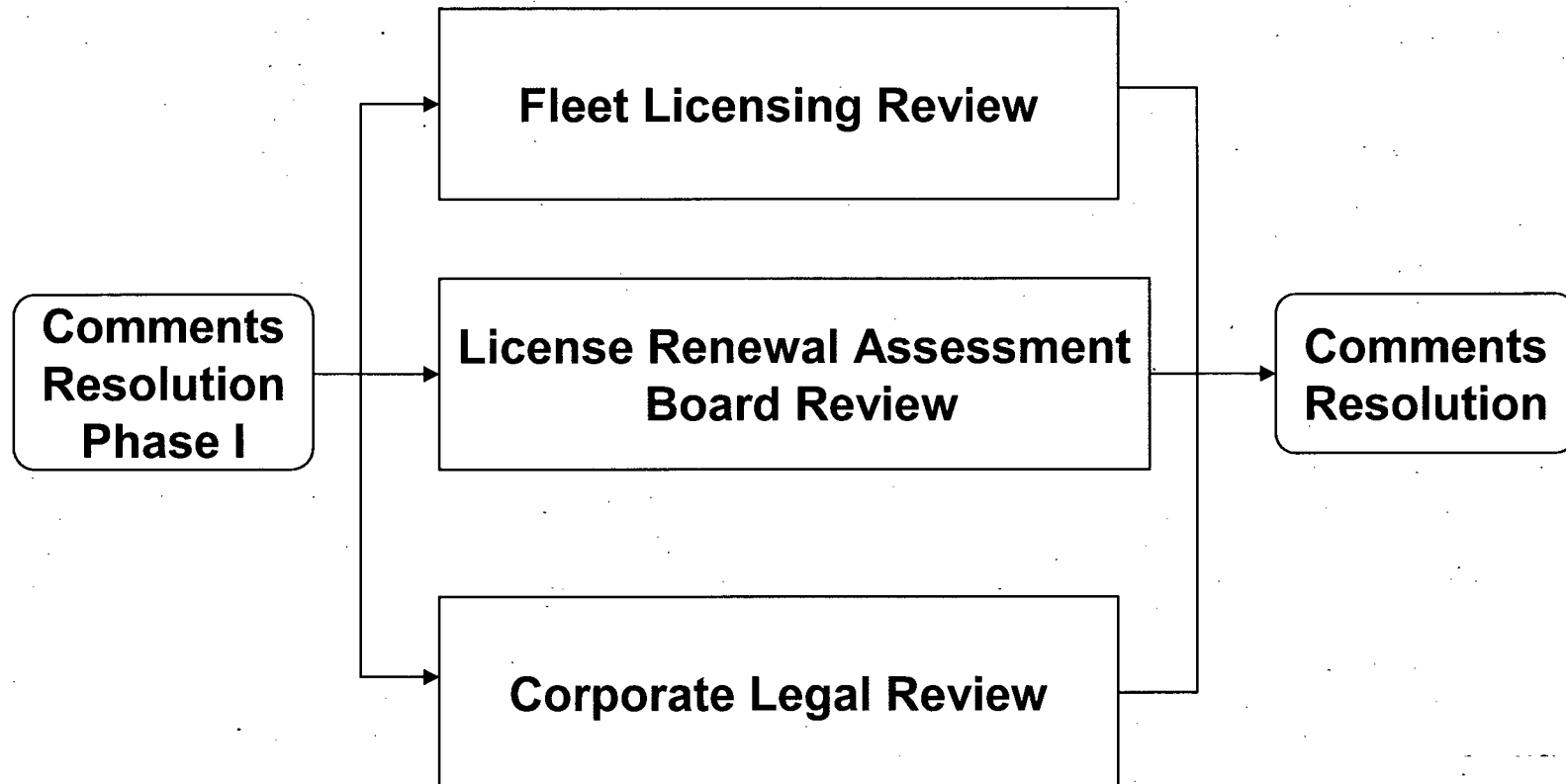
LRAB Conclusions:

- **Industry involvement & use of lessons learned was effective**
- **Procedures are aligned with current industry expectations**
- **Appropriate level of interaction with BVPS program owners**
- **Historical RAI evaluation is adequate**
- **Document structure supports LRA & NRC inspection & audits**
- **The review process through Phase 1 has been effective**
- **LRA adequate for submittal – pending resolution of open items**

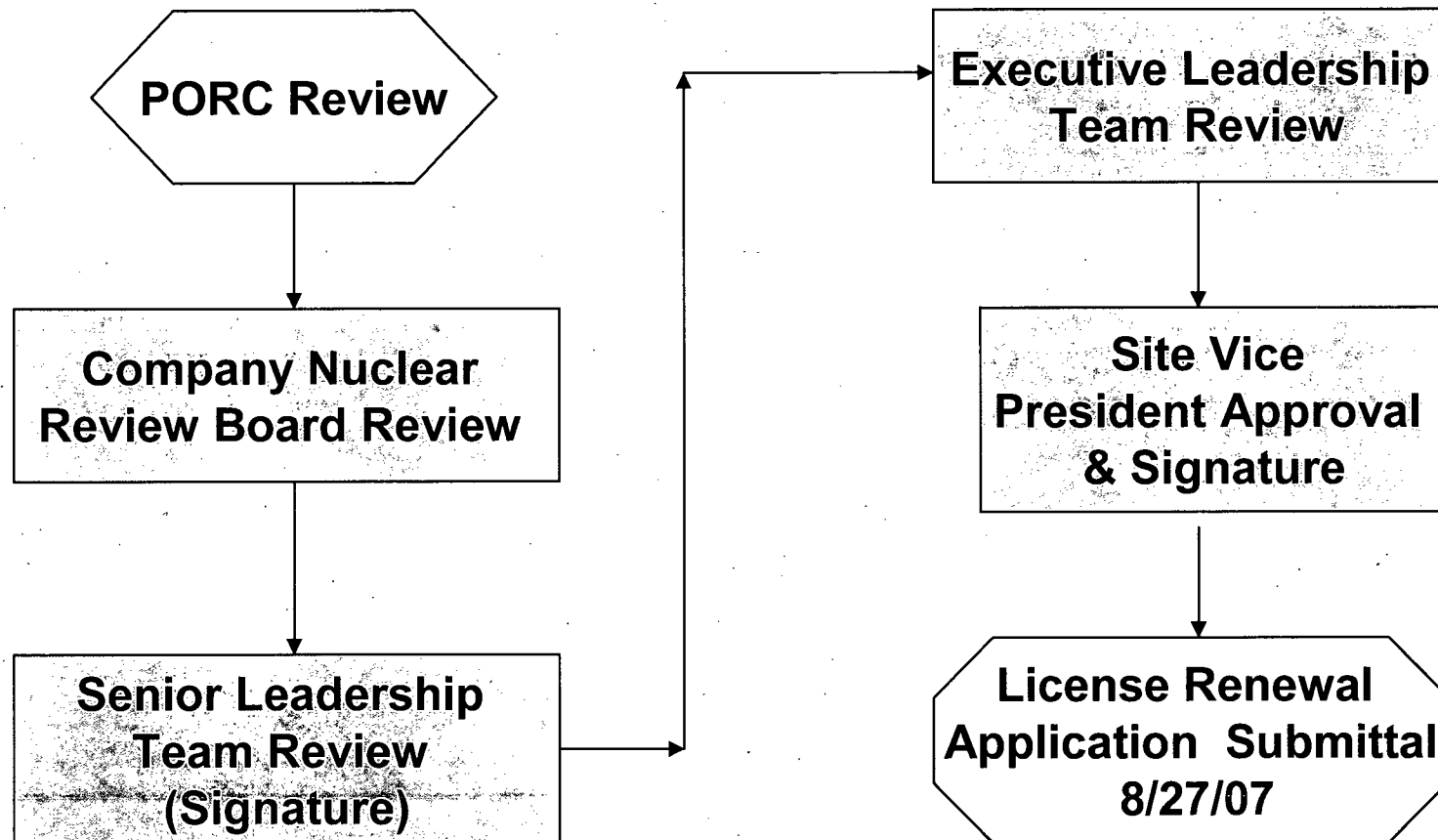
Review - Phase I



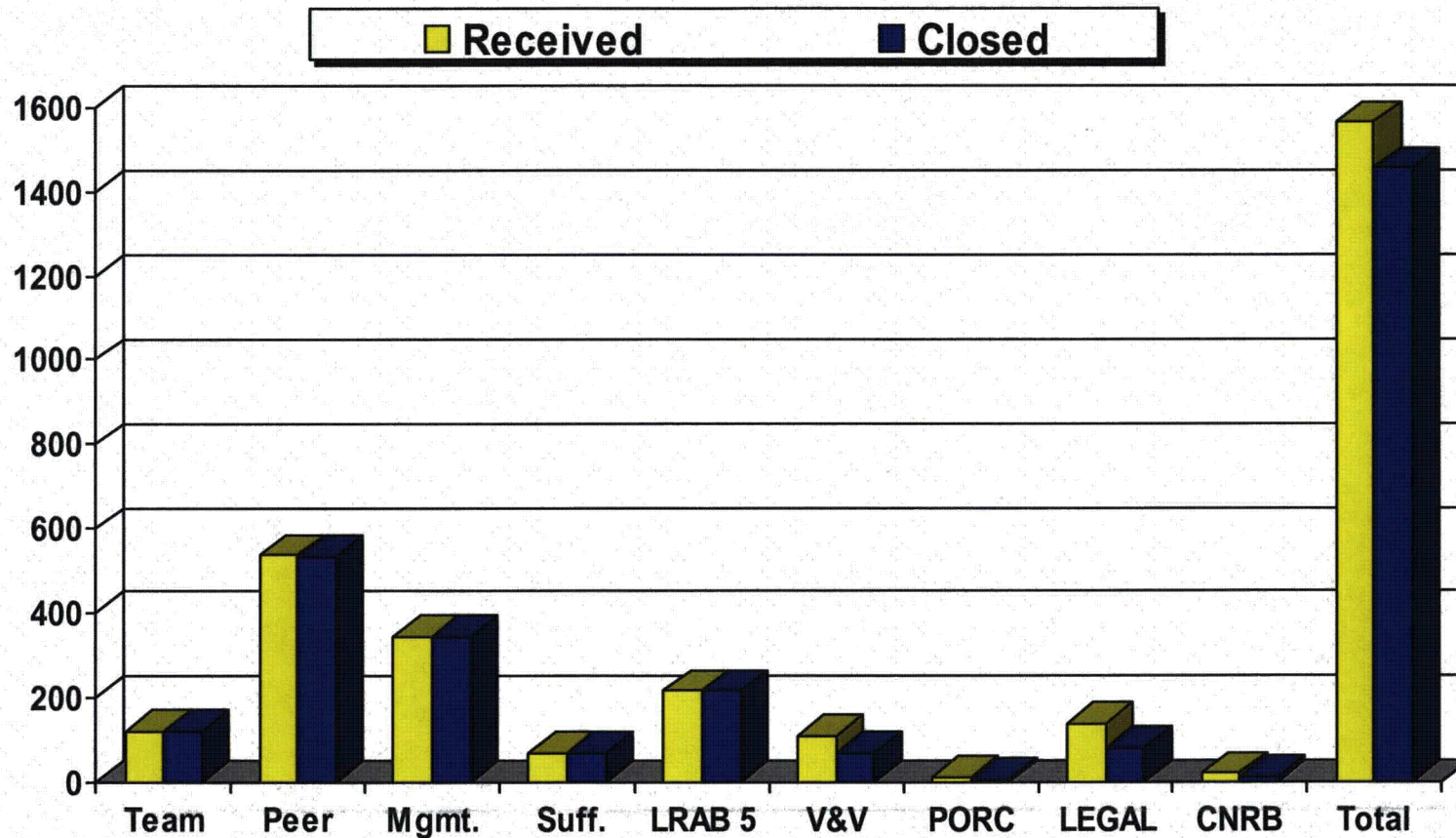
Review - Phase II



Review - Phase III



Review - Comments Status



Submittal Items of Interest

- **RT(PTS) evaluation**
- **Metal Fatigue DBD**
- **Midland Propane Terminal**
- **SAMA correction – regarding SECPOP errors**
- **TLAA approach**
- **GALL conformance**
- **Environmental Report revision – refurbishment**

Submittal Items of Interest

42 Total Aging Management Programs

16 New

26 Existing

**2 Plant -
Specific**

12 GALL

2 Future

**2 Plant -
Specific**

24 GALL

Submittal Items of Interest

Plant-Specific Programs - evaluated 4 programs:

- B.2.10: Electrical Cable Connections - not subject to 10 CFR 50.49 environmental qualification requirements one-time inspection
- B.2.13: Electrical Wooden Poles/Structures inspection (Unit 2 Only)
- B.2.35: Reactor Vessel Integrity
- B.2.37: Settlement Monitoring (Unit 2 Only)

Submittal Items of Interest

Variances & Exceptions:

- **7 Programs take exception to NUREG-1801**
 - 4 ASME code programs: code edition
 - Fire protection: testing frequency of halon and CO₂ systems
 - Fuel Oil Chemistry: ASTM standards, additives, and periodic testing for microbiological activity
 - Selective Leaching: Brinell hardness testing

Submittal Items of Interest

Action Items:

- **Midland Propane Terminal**
- **PTS analysis docketing per 10CFR50.61**
- **Planned PRA peer evaluation**
 - (Reg. Guide 1.200)
- **NFPA 805 submittal schedule**

Closing Remarks

Pete Sena, BVPS Site VP