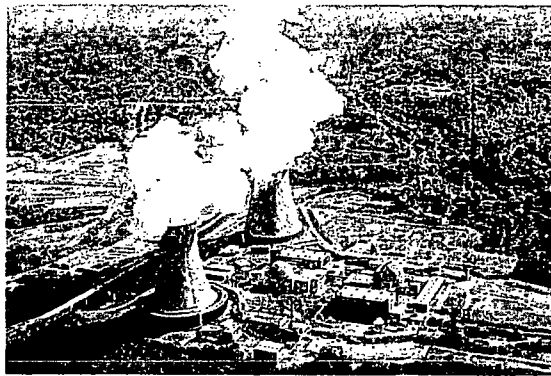


BEAVER VALLEY POWER STATION

License Renewal Application



**BVPS License
Renewal Project**

**Presentation to
NRC**

Aug. 2, 2007

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Introduction

**Greg Halnon, Director Fleet
Regulatory Affairs**

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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

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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

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2005 Project Review

2005 Project: Root Causes:

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

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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

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Current Project Overview

What's different this time?

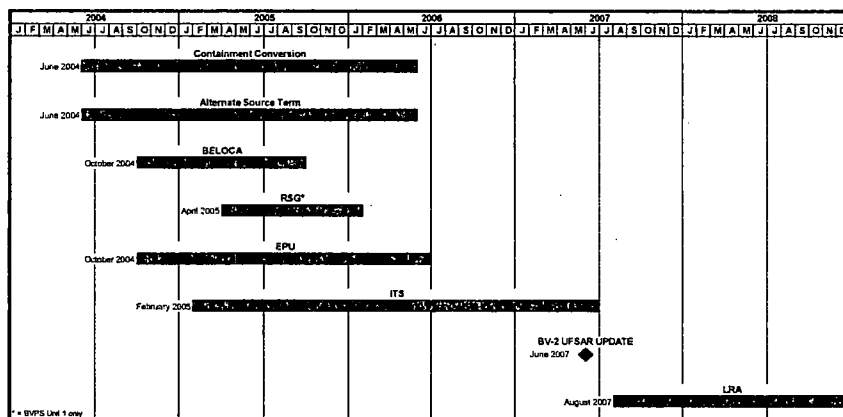
- Root Causes & Lessons Learned have been addressed
- Industry Participation to remain current with standards
- Site Participation & use of Site-Specific Operating Experience
- CLB items related to License Renewal identified & addressed
- Built-in Quality – Approval Structure, LRAB, Review Cycle (Internal/External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

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Current Project Overview

Current Licensing Basis Reconciliation



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Current Project Overview

Site Participation:

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

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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

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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

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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

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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**

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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**

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Oversight

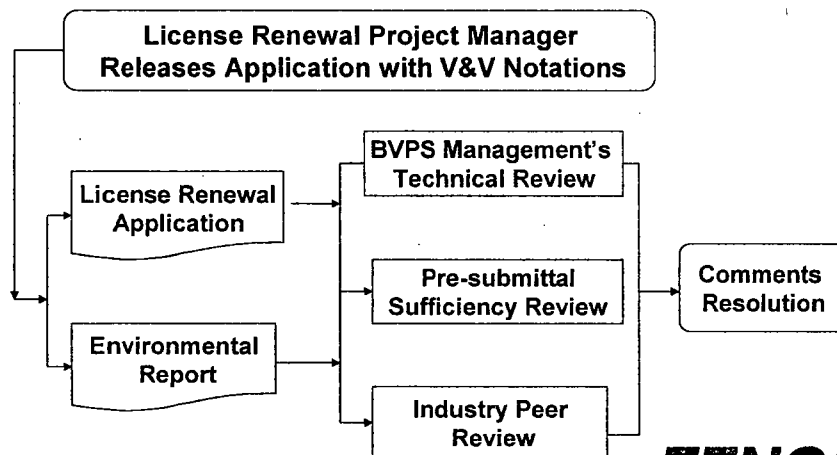
LRAB Conclusions:

- 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

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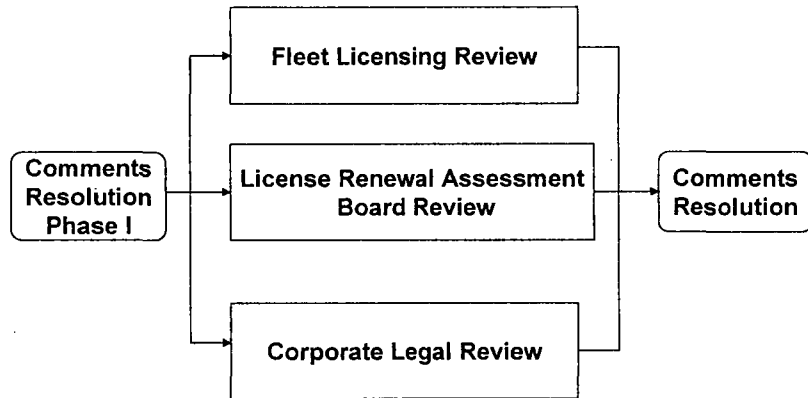
Review - Phase I



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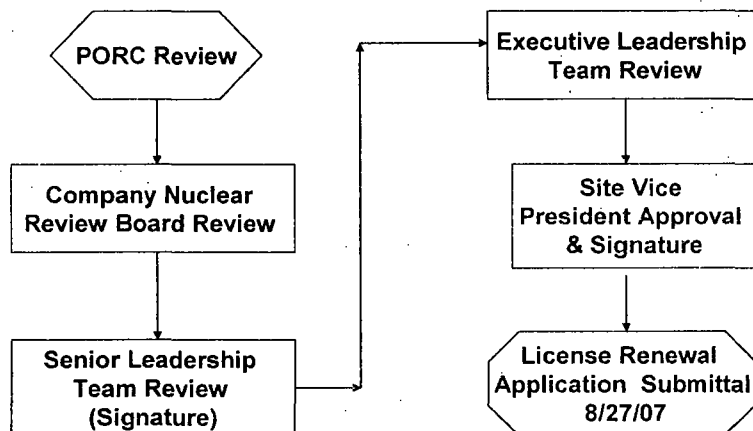
Review - Phase II



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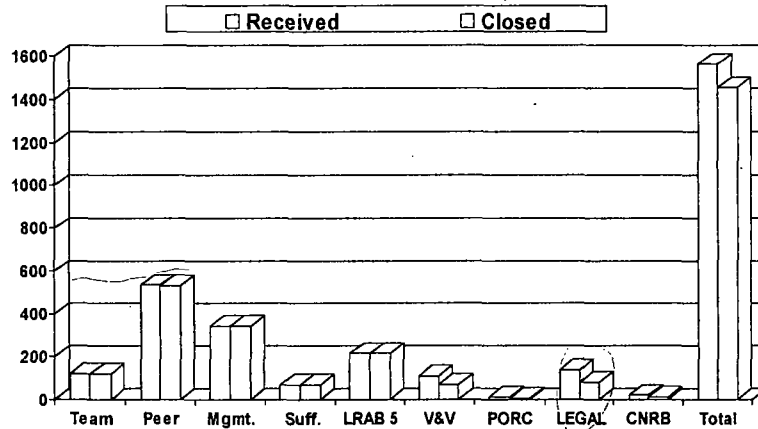
Review - Phase III



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Review - Comments Status



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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

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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

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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)

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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

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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**

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Closing Remarks

Pete Sena, BVPS Site VP

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