



FirstEnergy Nuclear Operating Company

76 South Main Street
Akron, Ohio 44308

Peter P. Sena III
President and Chief Operating Officer

June 11, 2012
L-12-193

10 CFR 50.54(f)

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

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
Davis-Besse Nuclear Power Station
Docket No. 50-346, License No. NPF-3
Perry Nuclear Power Plant
Docket No. 50-440, License No. NPF-58
Response to NRC Letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, Dated March 12, 2012

On March 12, 2012, the Nuclear Regulatory Commission (NRC) staff issued a letter titled, "Request for Information Pursuant to Title 10 of the *Code of Federal Regulations* 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident." Enclosure 5 of the letter contained specific Requested Actions and Requested Information associated with Recommendation 9.3 for Emergency Preparedness (EP) programs. In accordance with 10 CFR 50.54, "Conditions of licenses," paragraph (f), addressees were requested to submit a written response to the information requests within 90 days.

In accordance with the 10 CFR 50.54(f) letter, FENOC submitted, by letter dated May 9, 2012, an alternative course of action for providing the requested information. The alternative course of action included revised due dates and the basis for those dates. As described in the alternative course of action, FENOC hereby submits the attached responses to Communications Request 2 and Staffing Requests 3, 4, and 5.

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This letter does not contain regulatory commitments. Should you have any questions concerning the contents of this letter, please contact Mr. Phil H. Lashley, Supervisor – Fleet Licensing, at 330-315-6808.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 11, 2012.

Respectfully,

A handwritten signature in black ink, appearing to read "Peter P. Sena, III", with a stylized flourish at the end.

Peter P. Sena, III

Attachment:

Requested Information Associated with Recommendation 9.3 for Emergency Preparedness (EP) Programs

cc: Director, Office of Nuclear Reactor Regulation (NRR)
NRC Region I Administrator
NRC Region III Administrator
NRC Resident Inspector (BVPS)
NRC Resident Inspector (DBNPS)
NRC Resident Inspector (PNPP)
NRR Project Manager (BVPS)
NRR Project Manager (DBNPS)
NRR Project Manager (PNPP)
Director BRP/DEP
Site BRP/DEP Representative
Utility Radiological Safety Board
Executive Director, Ohio Emergency Management Agency,
State of Ohio (NRC Liaison)
Director, Pennsylvania Emergency Management Agency

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Requested Information Associated with Recommendation 9.3
for Emergency Preparedness (EP) Programs
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Enclosure 5 of the Nuclear Regulatory Commission (NRC) letter dated March 12, 2012, issued pursuant to 10 CFR 50.54(f), contained requests for information associated with Near-Term Task Force Recommendation 9.3 for EP programs. By letter dated May 9, 2012, FirstEnergy Nuclear Operating Company (FENOC) committed to providing the following information by June 11, 2012. The request is identified below by bold type, followed by the FENOC response.

Communications

Request 2: Addressees are requested to describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete.

Actions Taken

FENOC ordered additional satellite phones, batteries, and chargers to enhance existing communications systems. The equipment is to be divided amongst the FENOC plants: Beaver Valley Power Station, Unit Nos. 1 and 2 (BVPS), Davis-Besse Nuclear Power Station (DBNPS), and Perry Nuclear Power Plant (PNPP). Equipment ordered includes a total of 3 base station Iridium satellite phones and 15 mobile Iridium satellite phones. Each of the mobile phones comes with an emergency kit containing an alternating current (AC) travel phone charger, direct current (DC) automobile phone charger, solar charger, portable auxiliary antenna and antenna adapter in a hard shell storm case. To extend the antenna access of some mobile satellite phones, a total of eight fixed mast antennas were ordered. An antenna cable of approximately 130 feet was also ordered for each antenna.

To provide continual power for the mobile satellite phones, FENOC ordered a total of 62 rechargeable batteries, 31 four-bay satellite phone battery chargers, 31 single-bay satellite phone battery chargers, 31 DC automobile outlet charger cords to charge single- and four-bay battery chargers, and 16 solar panels to charge the battery in the phone.

FENOC intends to have two spare batteries per satellite phone. Each spare rechargeable battery allows approximately 3.2 hours of talking time or approximately 30 hours of standby time, depending on the use of the phone.

The four-bay satellite phone battery chargers are powered by AC and expected to be used for standby charging and maintaining batteries. The single-bay satellite phone battery chargers are powered by DC and expected to charge batteries in the field during an emergency or during the loss of main AC power. Charging time for the battery in the

charger is 90 minutes. The solar panels to charge the battery in the phone are expected to be of minimal use, but do provide another alternate power source

The current communications systems are enhanced by providing satellite phone capability at plant locations not previously having this capability. The additional batteries and chargers allow the plants to maintain communications capabilities for an extended period of time.

Actions Planned

The ordered equipment is expected to be delivered by July 9, 2012, directly to the applicable FENOC plant: BVPS, DBNPS, and PNPP. FENOC intends to locate at least one base satellite station and two phones in diverse, protected locations and develop specific strategies for maintenance and storage.

Staffing

Request 3: Identify how the augmented staff would be notified given degraded communications capabilities.

FENOC currently follows an "all respond" philosophy for emergency response organization (ERO) members following a large scale disaster, which is consistent with the guidance of NEI 12-01, *Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities*. ERO members, including augmented staff, are expected to report to their emergency response facility during a large scale disaster.

This expectation is expressed in the ERO procedure at DBNPS and in ERO expectation communications at BVPS and PNPP. FENOC intends to strengthen the expectation for ERO members to report to their emergency response facility in the event of a natural disaster, loss of communication capabilities, or a widespread loss of the AC power grid by revising the FENOC Emergency Preparedness policy by June 29, 2012.

Request 4: Identify the methods of access (e.g., roadways, navigable bodies of water and dockage, airlift, etc.) to the site that are expected to be available after a widespread large scale natural event.

BVPS is accessible by a state road, a paved county road, and the Ohio River. BVPS also has access to a helicopter landing pad located at the adjacent Bruce Mansfield station.

DBNPS is accessible by a state road, a paved county road, and Lake Erie. The site has several open areas that can be used to land a helicopter. Private docks are available to the south and north of the property for small boats.

PNPP is accessible by paved county roads, with state roads nearby, and Lake Erie. The site has a designated helicopter landing zone.

FENOC currently has letters of agreement with the Pennsylvania Emergency Management Agency (EMA), West Virginia EMA, Ohio EMA, Beaver County Emergency Services, Columbiana County EMA, Hancock County Office of Emergency Management, Ottawa County EMA, Lucas County EMA, Lake County EMA, Geauga County Emergency Services, and Ashtabula County EMA regarding emergencies at the plants. The state EMAs are the central coordinating agencies for mutual aid for state, local, and federal resources. This would include clearing of access roads as conditions warrant, as well as water and air transportation support, as needed.

Locations from which personnel could be transported could vary based on the conditions after the external event. Airlift of critical personnel could be accomplished from nearby communities via helicopter. Likewise, with the three plants located on navigable waterways, boats could be used to transport personnel.

Request 5: Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.

As noted above, FENOC currently follows an "all respond" philosophy for emergency response organization (ERO) members following a large scale disaster. ERO members are expected to report to their emergency response facility during a large scale disaster. FENOC intends to strengthen this expectation by revising the FENOC Emergency Preparedness policy by June 29, 2012.