



FirstEnergy®

FENOC

FENOC

Licensing Activity Status Meeting

June 26, 2012

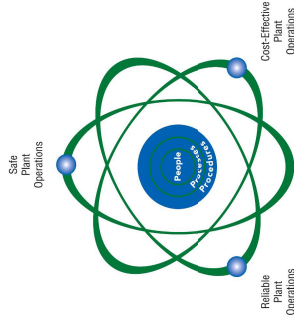
Agenda

■ Opening Remarks	Greg Halnon
■ FENOC Regulatory Affairs	Greg Halnon
■ Cyber Security	Robin Ritzman
■ Dry Cask Storage	Ben Spiesman
■ Probabilistic Risk Assessment Submittals	Phil Lashley
■ Fleet Licensing Activities – NFPA 805	Henry Hegrat
■ Fleet Licensing Activities – OPDRVs	Brad Ferrell
■ Fleet Licensing Activities – Fukushima	Kathy Nevins
■ Fleet Licensing Activities – NRC Review	Phil Lashley
■ Fleet Licensing Activities – Future Submittals	Phil Lashley
■ Open Discussion	All

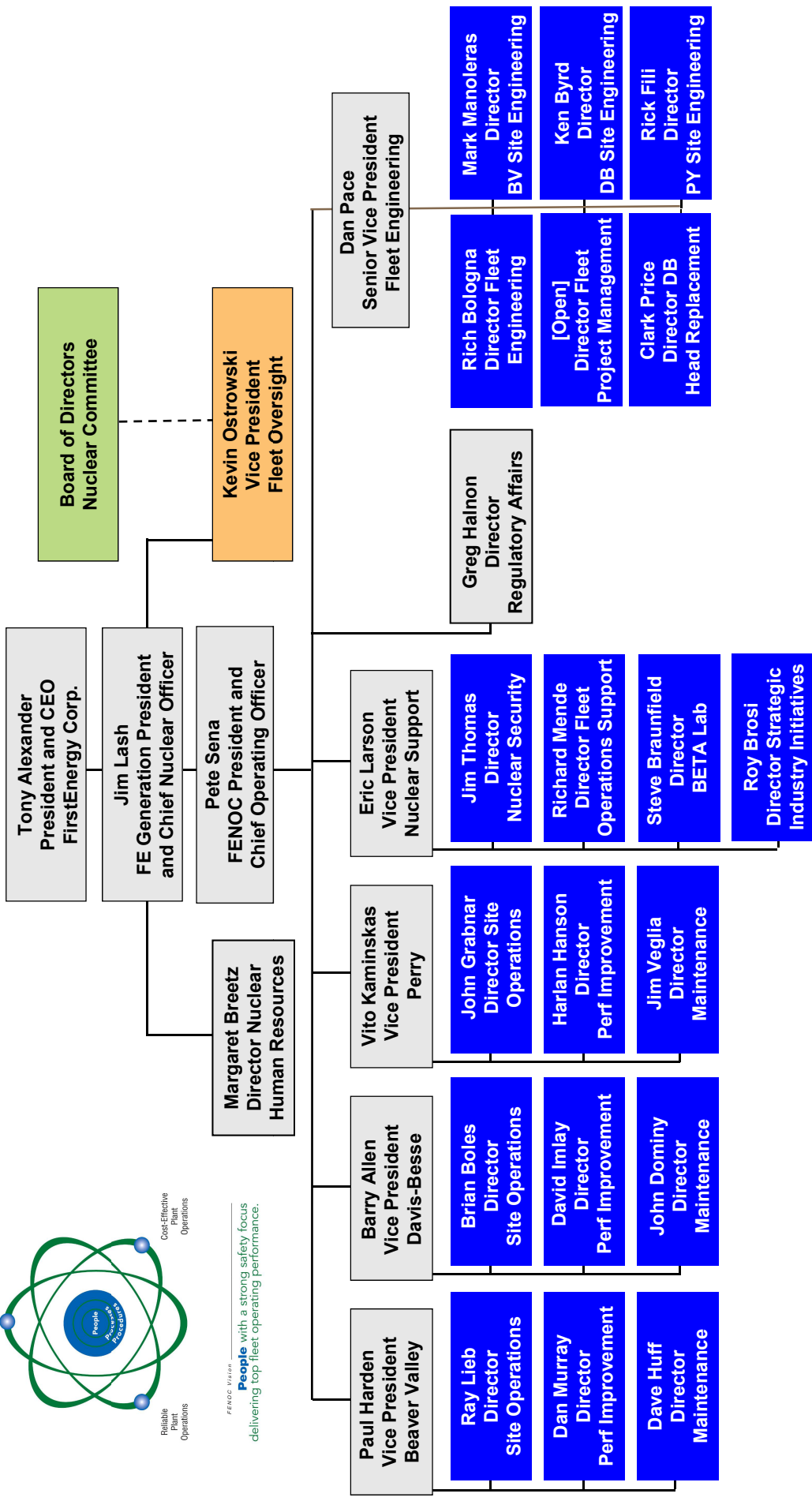
Meeting Objectives

- Provide an overview of FENOC Fleet Regulatory Affairs organization and roles and responsibilities
- Provide an overview of ongoing and future FENOC Licensing Activities
- Share insights/perspectives on current issues

FENOC Organization



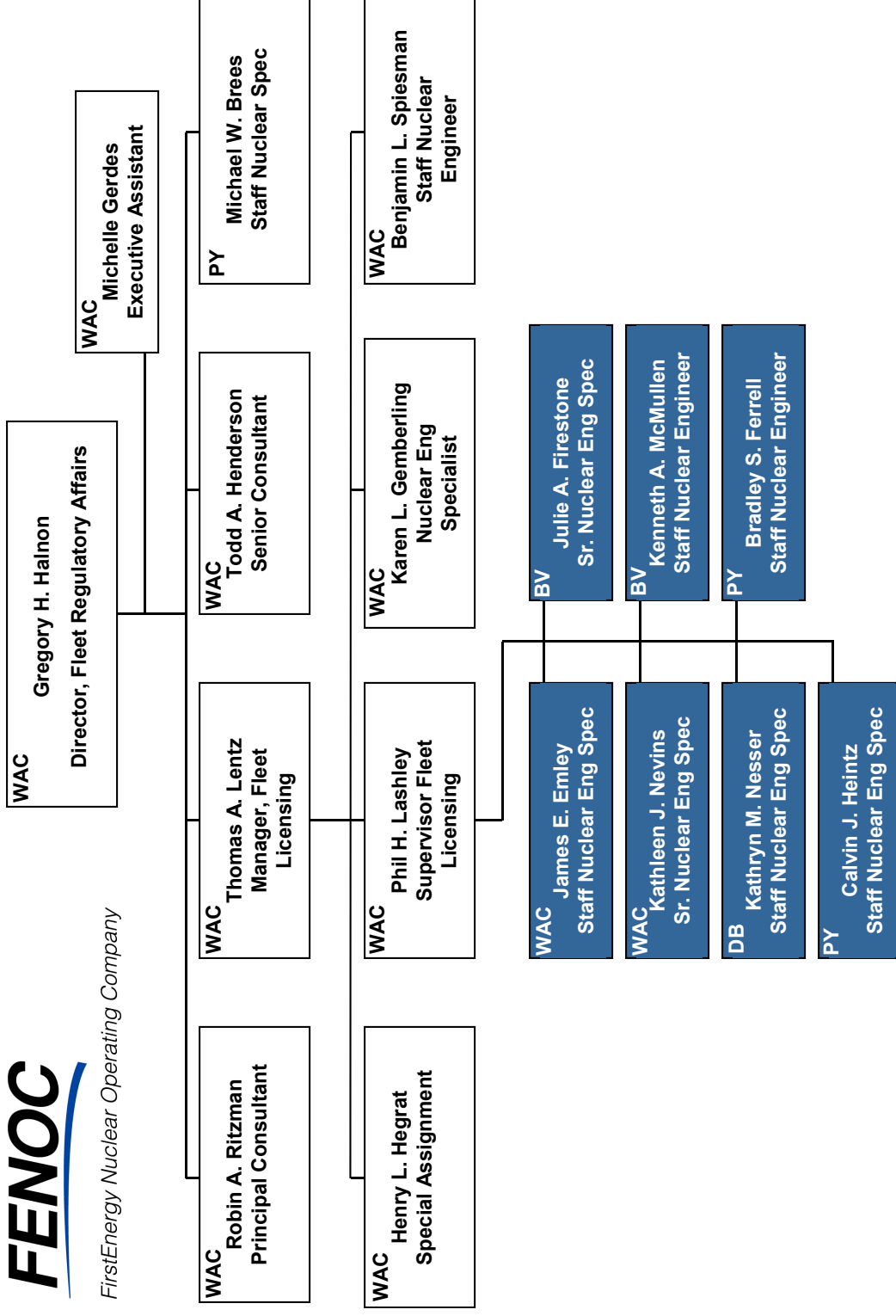
People with a strong safety focus delivering top fleet operating performance.



Fleet Regulatory Affairs



FirstEnergy Nuclear Operating Company



Note: WAC = West Akron Campus, BV = Beaver Valley, PY = Perry, DB = Davis Besse

Cyber Security

- Seven 2012 Milestones
 1. Establish Cyber Security Assessment Team
 2. Identify Critical Systems and Critical Digital Assets (CDAs)
 3. Install “deterministic one-way device”
 4. Implement “Access Control for Portable and Mobile Devices” (security control D 1.19)
 5. Add observation and identification of obvious cyber related tampering to existing insider mitigation rounds

Cyber Security

- Seven 2012 Milestones
 6. Identify, document, and implement **Appendix D** *technical* cyber security controls for CDAs that could adversely impact the design function of physical security target set equipment
 7. Implement ongoing monitoring and assessment activities for CDAs in item 6
- Full implementation
 - Beaver Valley 2/1/2016
 - Davis-Besse 7/1/2016
 - Perry 7/1/2015

Cyber Security

- Cyber Security Documents
 - Reg Guide 5.71, Cyber Security Programs for Nuclear Facilities
 - NEI 08-09, Cyber Security Plan for Nuclear Power Reactors
 - Site Cyber Security Plan
 - NEI 10-04, Identifying Systems and Assets Subject to the Cyber Security Rule
 - NEI 10-08, Cyber Security Program Review
 - NEI 10-09, Addressing Cyber Security Controls for Nuclear Power Reactors
 - “Compliance Matrix”
 - Inspection Procedure
 - Significance Determination Process

Dry Cask Storage

- Perry has implemented an Independent Spent Fuel Installation (ISFSI) facility as a General Licensee per 10 CFR 72.210 and 10 CFR 72.212
 - Perry has chosen the Holtec HI-STORM 100 System
 - Applicable Certificate of Compliance (CoC) is 1014, Amendment 5, FSAR revision 7
 - A fleet 10 CFR 72.48 program has been established for FENOC
- Beginning in July 2012, Perry will embark on its initial spent fuel loading campaign
 - Currently 60 cells short for full core offload
 - Plan to load 408 spent fuel bundles prior to new fuel receipt for the next refuel outage
 - A total of 6 Holtec HI-STORM 100 casks to be loaded
 - Loading 6 casks will establish full core off load capability through operating Cycle 14
 - Also plan to perform required fuel moves to establish B.5.B specification and fuel pool optimization for fuel receipt and full core off-load (~700 moves)

Dry Cask Storage

Challenge Areas For Perry ISFSI Project:

- Seismic Restraint System
 - Time intensive
 - Potential for adding an additional day to each Cask Load
 - Adds dose challenges
- Fatigue Management
 - Prepare schedule anticipating rule change in July
- Vertical Cask Transporter performance

NRC Region III Inspection Activities

- Extensive engineering review completed
 - Logged and resolved over 300 questions
 - Stack up issue & restraints
- Dry run inspection scheduled for mid-June
 - Success will allow dry cask loading campaign to move forward

Probabilistic Risk Assessment Submittals

- TSTF-425, Surveillance Frequency Control Program
 - Beaver Valley – Reg Guide 1.200, with internal flooding – June 2012
 - Davis-Besse and Perry – Reg Guide 1.200, with internal flooding – September 2012
 - FENOC Executive Leadership Team has indicated interest in pursuing this amendment across the fleet
 - Request development and submittal timeline have not been established

Probabilistic Risk Assessment Submittals

- TSTF-505, Extended Completion Times
 - Beaver Valley and Davis-Besse – Reg Guide 1.200, Revision 2 with external events – 2014.
 - Request development and submittal timeline have not been established.
- Perry
 - Maintaining deterministic fire protection approach
 - Fire PRA model, if developed, will be independent of NFPA 805

Fleet Licensing Activities – NFPA 805

- NFPA 805 license amendment applications are to be consistent with NEI 04-02 and Reg Guide 1.205.
- Precedent industry licensing action and operating experience are being incorporated into the initial applications.
- Pre-submittal meetings are not considered necessary at this time.

Fleet Licensing Activities – NFPA 805

Beaver Valley

- Scheduled submittal date: September 29, 2012
- Current schedule has not changed, but significant challenges exist.
- Evaluating options for schedule extensions and enforcement alternatives if necessary.

Fleet Licensing Activities – NFPA 805

Davis-Besse

- Scheduled submittal date: July 1, 2014
- No current obstacles to successfully meeting schedule.

Perry

- Not currently committed to NFPA-805 transition

Fleet Licensing Activities - OPDRVs

- Will utilize provisions in EGM 11-003 during spring 2013 refueling outage
- Active participant in developing TSTF Traveler to resolve this subject long-term
- Due to primary and secondary containment design, PNPP will be a lead plant in submitting a plant-specific version of the TSTF Traveler
- PNPP application submitted in early 2013 with approval requested to support spring 2015 refueling outage

Fleet Licensing Activities - Fukushima

- Near-Term Task Force (NTTF) Recommendation 2.1, Seismic and Flooding Reevaluations
 - Seismic
 - Screening and prioritization criteria, implementation details of risk assessment to be developed by November 30, 2012
 - Flooding
 - Category 2 sites, due March 12, 2014: Beaver Valley Power Station and Davis-Besse Nuclear Power Station
 - Category 3 site, due March 12, 2015: Perry Nuclear Power Plant
- NTTF Recommendation 2.3, Seismic and Flooding Walkdowns
 - Seismic
 - Identify approach by July 10, 2012
 - Completion of walkdowns due 180 days after guidance issued
 - Flooding
 - Completion of walkdowns due 180 days after guidance issued

Fleet Licensing Activities - Fukushima

- NTTF Recommendation 4.2, Mitigation Strategies for Beyond-Design-Basis External Events (Order EA-12-049)
 - Interim Staff Guidance (ISG) to be issued in August 2012
 - Provide initial status report 60 days after final ISG issued
- NTTF Recommendation 7.1, Reliable Spent Fuel Pool (SFP) Instrumentation (Order EA-12-051)
 - ISG scheduled to be issued in August 2012
 - Provide initial status report 60 days after final ISG issued
- NTTF Recommendation 9.3, Enhanced Emergency Preparedness Communications and Staffing
 - Communications
 - Provide communications assessment (Request No. 1) and implementation schedule (Request No. 3) by October 31, 2012
 - Staffing
 - Phase 1 staffing assessment for Beaver Valley Power Station (multi-unit plant) only

Fleet Licensing Activities – NRC Review

- BVPS Emergency Action Level Conversion
- BVPS-2 Root Mean Square Error
- BVPS 10 CFR 50.46 Report
- DBNPS 10-Year Inservice Testing Interval Requests
- DBNPS Nonconservative Technical Specification for Emergency Diesel Generator Voltage
- PNPP Risk-Informed Inservice Inspection Request
- PNPP TSTF-484

Fleet Licensing Activities – Future Submittals

- BVPS-1 Atmospheric Dump Valve
- BVPS- End of Life Moderator Temperature Coefficient
- BVPS- Alternate Pressurized Thermal Shock Rule
- BVPS Updated Relay Scheme to Lower Allowable Degraded Voltage Value to 90 Seconds
- BV-2 Steam Generator Replacement LAR (2015)
- DBNPS TSTF-501 for Nonconservative Technical Specification for Diesel Fuel Oil and Lube Oil Levels

Fleet Licensing Activities – Future Submittals

- DBNPS Technical Specification Amendment to Support Steam Generator Replacement
- PNPP TSTF-423 Revised End States
- PNPP License Renewal (2015)
- PNPP EAL Conversion
- Potential submittals to address GDC-17 Electrical Design Issue

discussion Questions Answers discussion