



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 28, 2015

Mr. Eric A. Larson, Site Vice President
FirstEnergy Nuclear Operating Company
Beaver Valley Power Station
Mail Stop A-BV-SEB1
P.O. Box 4, Route 168
Shippingport, PA 15077

SUBJECT: BEAVER VALLEY POWER STATION, UNIT NOS. 1 AND 2 – CORRECTION TO
AMENDMENT NOS. 294 AND 182 REGARDING MODIFICATION OF
EMERGENCY PREPAREDNESS PLAN REGARDING THE EMERGENCY
PLANNING ZONE BOUNDARY (TAC NOS. MF4765 AND MF4766)

Dear Mr. Larson:

On July 9, 2015, the U.S. Nuclear Regulatory Commission (NRC) issued Amendment Nos. 294 and 182 to Renewed Facility Operating License Nos. DPR-66 and NPF-73 for the Beaver Valley Power Station (BVPS), Units 1 and 2 (Agencywide Documents Access and Management System Accession No. ML15131A006), in response to your application dated September 4, 2014, as supplemented by letter dated December 1, 2014. The amendments modified the 10-mile emergency planning zone (EPZ) boundary to align it with the boundary that is used by the emergency management agencies of the three counties that implement public protective actions around BVPS.

On July 24, 2015, FirstEnergy Nuclear Operating Company staff notified the NRC staff that page 5 of the safety evaluation (SE) for BVPS Amendment Nos. 294 and 182 contained two errors in the second paragraph of SE Section 3.2.1.1. The paragraph, as issued with the amendments, read as follows:

In 2003, the Evacuation Time Estimate (ETE) evaluation for the 2000 Census was completed, and changes were incorporated into Revision 27 of the BVPS EPP. The Ohio EPZ boundaries in the EPP involve slight reductions in the EPZ area. Columbiana County revised their emergency plan in the early-2000s to coincide with the 10-mile EPZ boundary in the BVPS EPP.

In the first sentence, "Revision 27" should have been "Revision 13." In the second and third sentences, "EPP" [Emergency Preparedness Plan] should have been "ETE."

Please replace page 5 of the SE with the enclosed corrected page 5.

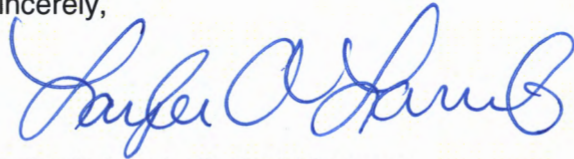
E. Larson

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The NRC staff regrets any inconvenience this may have caused.

If you have any questions, please contact me at (301) 415-7128 or Taylor.Lamb@nrc.gov.

Sincerely,



Taylor A. Lamb, Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-334 and 50-412

Enclosure:
Corrected SE page 5

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Enclosure

how BVPS performs dose projections or how BVPS determines PARS. Thus, the BVPS dose projections and PARs do not directly consider the geopolitical boundaries as defined for the BVPS 10-mile EPZ.

3.2 Evaluation

In considering the safety impact of the proposed changes to the BVPS EPP, the NRC staff considered the impact on the ability of the licensee to perform the protective actions functions required by 10 CFR 50.47(b)(10). The staff evaluated the proposed change against the capability to perform the protective action functions to determine whether the capability to perform these functions is lost and/or degraded.

3.2.1 Evaluation of Changes

3.2.1.1 Change 1 – Columbiana County, Ohio

The license amendment request proposes three changes that slightly reduce the BVPS 10-mile EPZ boundary within Columbiana County, Ohio:

- Area north of Ohio sub-area O-4
- Area northwest of Ohio sub-area O-3
- Area west of Ohio sub-areas O-2 and O-3

In 2003, the Evacuation Time Estimate (ETE) evaluation for the 2000 Census was completed, and changes were incorporated into Revision 13 of the BVPS EPP. The Ohio EPZ boundaries in the ETE involve slight reductions in the EPZ area. Columbiana County revised their emergency plan in the early-2000s to coincide with the 10-mile EPZ boundary in the BVPS ETE.

The proposed changes are consistent with current guidance that states that the decision to implement a protective action should be based on the projected radiation dose that would be incurred by the public if the protective action were not implemented, that is, the dose that would be avoided by taking the action. Radiation doses that occurred prior to implementing the protective action are not considered. Another key principle is that the risk to health from a protective action should not exceed the risk to health from the dose that would be avoided.

In addition, the proposed changes are consistent with the EPA's "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents," (Ref. 7) which recognizes that it is possible during the planning process to make value judgments as to which decisions are not required, which can be made based on prior judgments, and which must be made during an actual emergency. Such pre-planning can reduce, to a manageable level, the complexity of decisions required to effectively protect the public at the time of an incident. Nonetheless, the key principle of protective actions, namely that the risk to health from a protective action should not exceed the risk to health from the dose that would be avoided, must be satisfied.

The guidance provided in NUREG-0654 (Ref. 6) makes evacuation of a 2-mile radius and 5-mile radius downwind the preferred initial protective action recommendation for a severe reactor accident involving actual or projected severe core damage or loss of control of facility. Based

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Sincerely,

/RA/

Taylor A. Lamb, Project Manager
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