

**From:** [Robinson, Jay](#)  
**To:** [Tobin, Jennifer](#)  
**Cc:** [Danna, James](#); [Venkataraman, Booma](#); [Casto, Greg](#)  
**Subject:** RE: BVPS NFPA 805 License Amendment Change Requested, and Other SE Comments  
**Date:** Monday, February 26, 2018 2:49:21 PM

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Jennifer,

Below is our review of the licensee's post amendment comments. Other than the new comment and comment 28, we do not see the need, nor do we agree with the licensee's justification for making the changes discussed in comments 18, 19, 48, and 100. The SE reflects the information the licensee provided on the docket. Comment 28 appears to be an inadvertent deletion and if needed we can trace it back to the version in ADAMs where it got deleted. Booma has already identified the issue regarding the new comment. If you have any questions or need any additional information, please let me know. Thanks. Jay.

Comment 18: We previously replied to this comment and stated: "No change. If the section required additional review by the staff, it is discussed. If it did not, it is not discussed. The lead in paragraph states this." To further clarify this comment, based on the information provided in the LAR, the NRC staff did not identify any need to perform additional review of NFPA 805, Section 3.3.6. The RAI requested that the licensee review all "Compliance with Clarification" compliance statements and ensure that the strategy is suitable for the condition. NFPA 805 Section 3.3.6 was not specifically identified in the RAI. The licensee included Section 3.3.6 in its RAI response and the NRC staff did not identify that additional review was needed upon reviewing the response. If the section required additional review by the staff, it would have been discussed in the SE along with the applicable RAIs and also how the licensee resolved the issue. We continue to not see any need to make any changes to the SE based on the licensee's comment.

Comment 19: We previously replied to this comment and stated: "No change. Covered in SE Section 3.1.1.7. Adequate pointers to SE Section 3.1.4.6 in the SE." We reviewed the SE and continue to not see any need to make any changes to the SE as there is adequate discussion in SE Section 3.1.1.7 concerning this issue. SE Section 3.1.1.7 concerns the licensee's use of multiple compliance strategies which is applicable in this case. Duplicating the discussion that is in SE Section 3.1.1.7 in SE Section 3.1.1.2 does not appear to serve any purpose.

Comment 28: : We previously replied to this comment and stated: "Changed". 2-SB-3 must have been inadvertently deleted. We can track down through the ADAMS versions where that occurred.

Comment 48: We previously replied to this comment and stated: "No change. As stated in LAR Attachment B, Table B02, Page 24." We reviewed the SE and the LAR and based on the information provided by the licensee in its LAR, cannot make the licensee's proposed change since it would not be consistent with what the licensee provided in its LAR on the docket.

Comment 100: We previously replied to this comment and stated: "No change. See response to comment 19." In response to comment 19, we stated: "No change. Covered in SE Section 3.1.1.7. Adequate pointers to SE Section 3.1.4.6 in the SE." See response to comment 19 above.

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**From:** Tobin, Jennifer  
**Sent:** Friday, February 23, 2018 3:12 PM  
**To:** Robinson, Jay <Jay.Robinson@nrc.gov>  
**Cc:** Danna, James <James.Danna@nrc.gov>; Venkataraman, Booma <Booma.Venkataraman@nrc.gov>  
**Subject:** BVPS NFPA 805 License Amendment Change Requested, and Other SE Comments

Good afternoon Jay,  
We received comments on the SE from Beaver Valley this morning (see attached and below) for our interactions on NFPA-805. Could you please take a quick look and let me know if we need to discuss their comment table with them? We will need to determine if a correction is needed or just a formal response. We can chat/touch base next week.

Have a great weekend!  
-Jenny

p.s. I'll be covering for Booma as PM for the next 6ish months on Beaver Valley ☺

Jenny Tobin  
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**From:** Lashley, Phil H. [<mailto:phlashley@firstenergycorp.com>]  
**Sent:** Friday, February 23, 2018 9:44 AM  
**To:** Venkataraman, Booma <[Booma.Venkataraman@nrc.gov](mailto:Booma.Venkataraman@nrc.gov)>  
**Cc:** McCreary, Dave M <[dmccreary@firstenergycorp.com](mailto:dmccreary@firstenergycorp.com)>; Tobin, Jennifer <[Jennifer.Tobin@nrc.gov](mailto:Jennifer.Tobin@nrc.gov)>  
**Subject:** [External\_Sender] FW: BVPS NFPA 805 License Amendment Change Requested, and Other SE Comments

Booma,

FENOC has completed reviewing the NRC NFPA 805 staff safety evaluation. Comments that we believe should be addressed from a technical standpoint are attached. Other than one comment (related to the new license condition issue described below), these are repeat comments from the draft SE. The comment numbers are provided in Column A of the spreadsheet.

Furthermore, there is one change requested on a BVPS-1 license page. The new BVPS-1 license condition 5.(c).3 is attached. The highlighted "Unit 1" should be "Unit 2." Attached is a supporting email as it was an item discussed between FENOC and the NRC while performing the draft SE review.

Respectfully,

Phil H. Lashley  
Fleet Licensing Supervisor

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