From:	Goetz, Sujata
Sent:	Thursday, September 16, 2021 10:45 AM
To:	Lashley, Phil H
Subject:	Request for Additional Information Regarding the LAR for Core Operating Limits (EPID L-2021-LLA-0075)
Attachments:	RAIs for Core Operating Limits Report Sept 8.docx

Dear Mr. Lashley,

By letter dated April 26, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21117A076), Energy Harbor Nuclear Company (the licensee) requested a licenses amendment to revise Technical Specification 5.6.3 "Core Operating Limits Report (COLR).

The Nuclear Regulatory Commission staff has reviewed your submittal and has determined that additional information, as stated in the attachment to this email, is needed to complete its review.

Please provide your response by October 30, 2021.

Sujata Goetz
Project Manager, Beaver Valley

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From: Goetz, Sujata

Created By: Sujata.Goetz@nrc.gov

Recipients:
"Lashley, Phil   H" <phlashley@energyharbor.com>
Tracking Status: None

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OFFICE OF NUCLEAR REACTOR REGULATION

REQUEST FOR ADDITIONAL INFORMATION

FOR THE REVISION OF THE

BEAVER VALLEY UNITS 1 AND 2,

LICENSE AMENDMENT REQUEST FOR CORE OPERATING REPORT

EPID: L-2020-LLA-0075

DOCKET NUMBERS 50-334 AND 50-412

By letter dated April 26, 2021, Energy Harbor Nuclear Corp, LLC, submitted a request for an amendment to the Technical Specifications (TS) for Beaver Valley Power Station, Unit Nos. 1 and 2, Facility Operating License numbers DPR-66 and NPF-73 respectively. The proposed amendment would revise TS 5.6.3 to allow the use of feedwater venturis that have been normalized to prior leading-edge flow meter (LEFM) measurements for calculating reactor thermal power.

The NRR staff has reviewed the information provided in the application and has determined that additional information is needed to complete its review.

RAI-1

Title 10 of the Code of Federal Regulations (10 CFR) Part 50 Appendix K, "ECCS Evaluation Models," allows for instrumentation uncertainties.

Section 2.1 of your license amendment request states that "The mass flow rate and feedwater temperature are displayed on the local display panel and transmitted to the plant process computer for use in the calorimetric measurement. Alarms are provided in the control rooms to alert operators should the systems require maintenance." What is the contingency plan in the event that the plant process computer fails?

RAI-2

Title 10 of the Code of Federal Regulations (10 CFR) Part 50 Appendix K, "ECCS Evaluation Models" allows for instrumentation uncertainties.

Section 2.3 of your license amendment request, states that in order to avoid a reduction in thermal power when the LEFM systems are nonfunctional, an allowed outage time of 3 days (72 hours) for repairs are an established safety practice in the nuclear power industry.

Section 3.0 of your license amendment states that for Unit 1, the 72-hour change in the upper bounds of the dataset with a 95 percent probability and 95 percent confidence was calculated to be 0.2859 percent. Similarly, the 120-hour change was calculated to be 0.2892 percent.

For Unit 2, the 72-hour change in the upper bounds of the dataset with a 95 percent probability and 95 percent confidence was calculated to be 0.2360 percent. Similarly, the 120-hour change was calculated to be 0.2381 percent.

Please provide the statistical evaluations used to determine the upper bounds of the data set in both Beaver Valley Unit 1 and Unit 2 and demonstrate that the uncertainties observed in the data have been addressed in the analysis.