

MEMORANDUM TO: File

February 16, 2000

FROM: Daniel Collins, Project Manager, Section 1 /RA/
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: BEAVER VALLEY 1 AND 2 - DRAFT RESPONSE TO NRC STAFF
CONCERNS REGARDING PROPOSED TECHNICAL SPECIFICATION
CHANGES [TAC NOS. MA4616 AND MA4617]

The attached draft of proposed Technical Specification Bases changes was received via electronic mail on February 1, 2000, from Anthony Dometrovich of FirstEnergy Nuclear Operating Company (FENOC; the licensee), following a telephone call between the Nuclear Regulatory Commission (NRC) staff and the licensee in which the NRC staff expressed concerns with proposed wording associated with the licensee's amendment request numbers 220 and 88, dated January 18, 1999. FENOC provided the draft response in an effort to ensure that their response adequately and completely addresses the staffs' concerns and avoid unnecessary delays in the NRC staffs' completion of their reviews. This memorandum and the attachment do not convey a formal response by the licensee or represent an NRC staff position

Docket Nos. 50-334 and 50-412

Attachment: As stated

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

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Division of Licensing Project Management
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A handwritten signature in black ink that reads "Daniel S. Collins".

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DRAFT

Proposed addition to Bases

1. REPLACE in the RX trip Bases section (Insert "F" for Unit 1 & page B 2-3 for Unit 2) the proposed words "The Limiting Safety System Settings are defined as the trip setpoints" with the following:

"The setpoint methodology is based on the trip setpoints being the Limiting Safety System Settings. However, for the purposes of reportability, as specified in 10 CFR 50.36, the automatic safety systems will function as required provided that the actuation settings do not violate the associated allowable values specified in Table 2.2-1. "

2. Revise Bases Inserts "F"& "D" (Unit 1) and Inserts "G" & "H" (Unit 2) as follows: Note changes are indicated in bold type.

It is consistent with the setpoint methodology for the "as left" trip setpoint to be outside the calibration tolerance band but in the conservative direction with respect to the Nominal Trip Setpoint provided that **procedurally** the Allowable Value(s) is adjusted accordingly **in the conservative direction with respect to Table 2.2-1.**

3. Revise Bases Insert "F" (Unit 1) and Insert "G" (Unit 2) as follows: Note changes are indicated in bold type.

For example, the Power Range Neutron Flux High trip setpoint may be set to a value less than specified in Table 2.2-1 during a plant condition where the Heat Flux Channel Factor - FQ(Z) **might exceed the limit specified in the plant's technical specifications.**

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