

March 10, 2000

MEMORANDUM TO: File Center

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 March 1, 2000, from Mr. Anthony Dometrovich of FirstEnergy Nuclear Operating Company (FENOC; the licensee). This was provided as a follow-up to a previous 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 staff's concerns and avoid unnecessary delays in the NRC staff's 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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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 new paragraph:

“For the purpose of demonstrating compliance with 10 CFR 50.36 to the extent that the Technical Specifications are required to specify the Limiting Safety System Settings (LSSS), the LSSS are comprised of both the Trip Setpoints and the Allowable Values specified in Table 2.2-1. The Trip Setpoint is the value that will ensure that safety analysis limits are met (with margin) considering factors which may effect channel performance such as process rack drift, rack calibration accuracy and process measurement accuracy. The Allowable Value serves as a reportability limit when a setpoint is found to be less conservative than the Trip Setpoint 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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