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May 28, 2008 L-08-180

10 CFR 54

ATTN: Document Control Desk U. S. Nuclear Regulatory Commission Washington, DC 20555-0001

SUBJECT: Beaver Valley Power Station, Unit Nos. 1 and 2 BV-1 Docket No. 50-334, License No. DPR-66 BV-2 Docket No. 50-412, License No. NPF-73 <u>Reply to Request for Additional Information for the Review of the Beaver Valley Power</u> <u>Station, Units 1 and 2, License Renewal Application (TAC Nos. MD6593 and MD6594)</u>

Reference 1 provided the FirstEnergy Nuclear Operating Company (FENOC) License Renewal Application (LRA) for the Beaver Valley Power Station (BVPS). Reference 2 requested additional information from FENOC regarding BVPS license renewal timelimited aging analyses in Section 4.2.4 of the BVPS LRA.

The Attachment provides the FENOC reply to the U.S. Nuclear Regulatory Commission request for additional information.

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Clifford I. Custer, Fleet License Renewal Project Manager, at 724-682-7139.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May <u>39</u>, 2008.

Sincerely,

Peter P. Sena III

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# **References:**

- 1. FENOC Letter L-07-113, "License Renewal Application," August 27, 2007.
- 2. NRC Letter, "Request for Additional Information for the Review of the Beaver Valley Power Station, Units 1 and 2, License Renewal Application (TAC Nos. MD6593 and MD6594)," April 28, 2008.

### Attachment:

Reply to Request for Additional Information Regarding Beaver Valley Power Station, Units 1 and 2, License Renewal Application, Section 4.2.4

- cc: Mr. K. L. Howard, NRC DLR Project Manager Mr. S. J. Collins, NRC Region I Administrator
- cc: w/o Attachment

Dr. S. S. Lee, NRC DLR Acting Director Mr. D. L. Werkheiser, NRC Senior Resident Inspector Ms. N. S. Morgan, NRC DORL Project Manager Mr. D. J. Allard, PA BRP/DEP Director Mr. L. E. Ryan, PA BRP/DEP

# ATTACHMENT L-08-180

# Reply to Request for Additional Information Regarding Beaver Valley Power Station, Units 1 and 2, License Renewal Application, Section 4.2.4 Page 1 of 2

#### Question RAI 4.2.4-1

In the BVPS LRA, it is not readily apparent if the Low-Temperature Overpressure Protection System (OPPS) was affected by recent plant changes (extended power uprates). The applicant states that, "As part of any update, the OPPS setpoints (OPPS enable temperature and power-operated relief valve setpoints) for both units are reviewed and updated as required based on the updated P-T limit curves." Please provide additional details or documentation to show if the OPPS itself was/was not affected by the extended power uprate.

## **RESPONSE RAI 4.2.4-1**

The Low-Temperature Overpressure Protection System (OPPS) analyses for Beaver Valley Power Station (BVPS), Unit 1 and Unit 2, have been updated to include extended power uprate (uprate to 2900 MWt) conditions.

Unit 1

The current BVPS Unit 1 Pressure and Temperature Limits Report (PTLR) is revision 4 (Reference 1). This revision changed the applicability of the heatup and cooldown requirement to 30 effective full power years (EFPY), and included changes to reflect the corresponding OPPS analysis. WCAP-16799-NP (Reference 2) documented the generation of the Unit 1 pressure-temperature (P-T) limit curves for 30 EFPY, and the resulting P-T limit curves were used as inputs to revision 4 of the Unit 1 PTLR and the corresponding OPPS analysis. The P-T limit curves in WCAP-16799-NP were based on updated dosimetry analyses that accounted for the increase in neutron fluence as a result of the extended power uprate. Therefore, the Unit 1 OPPS analysis has been updated to include extended power uprate conditions.

### Unit 2

The BVPS Unit 2 PTLR, revision 1 (Reference 3), contained editorial changes to reflect the Technical Specifications and Licensing Requirements that reference the PTLR. This revision to the Unit 2 PTLR also included changes to reflect the Capsule W analysis and corresponding OPPS analysis. The applicability of the heatup and cooldown requirement remained at 22 EFPY in revision 1 of the PTLR. WCAP-15677 (Reference 4) documented the generation of the P-T limit curves for 22 EFPY, and the resulting P-T limit curves were used as inputs to revision 1 of the Unit 2 PTLR and the corresponding OPPS analysis. The P-T limit curves in WCAP-15677 were based on Attachment L-08-180 Page 2 of 2

updated dosimetry analyses that accounted for the increase in neutron fluence as a result of the extended power uprate (uprate to 2900 MWt). Therefore, the Unit 2 OPPS analysis has been updated to include extended power uprate (uprate to 2900 MWt) conditions.

The current BVPS Unit 2 PTLR is revision 2 (Reference 5), and was associated with the implementation of the BVPS Improved Technical Specification conversion License Amendment for Unit 2. The applicability of the heatup and cooldown requirement remained at 22 EFPY.

References:

- 1. FENOC Letter L-07-130, "Beaver Valley Power Station, Unit No. 1, Unit 1 Pressure and Temperature Limits Report, Revision 4," September 19, 2007 (ML072670026).
- 2. WCAP-16799-NP, "Beaver Valley Power Station Unit 1 Heatup and Cooldown Limit Curves for Normal Operation," Revision 1, June 2007.
- 3. FENOC Letter L-05-063, "Beaver Valley Power Station, Unit Nos. 1 and 2, Pressure and Temperature Limits Report, Revision 1," March 31, 2005 (ML050960554).
- 4. WCAP-15677, "Beaver Valley Unit 2 Heatup and Cooldown Limit Curves for Normal Operation," August 2001.
- FENOC Letter L-07-087, "Beaver Valley Power Station, Unit No. 2, Core Operating Limits Report, COLR 13-2, Pressure and Temperature Limits Report, Revision 2," June 25, 2007 (ML071790328).