



First Energy Nuclear Operating Company

76 South Main Street
Akron, Ohio 44308

Peter P. Sena III
President and Chief Nuclear Officer

February 27, 2013
L-13-035

10 CFR 2.202

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-001

SUBJECT:

Beaver Valley Power Station, Unit Nos. 1 and 2
Docket No. 50-334, License No. DPR-66
Docket No. 50-412, License No. NPF-73
Davis-Besse Nuclear Power Station
Docket No. 50-346, License No. NPF-3
Perry Nuclear Power Plant
Docket No. 50-440, License No. NPF-58
FirstEnergy Nuclear Operating Company's (FENOC's) Overall Integrated Plan in
Response to March 12, 2012 Commission Order Modifying Licenses with Regard to
Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order
Number EA-12-049)

References:

1. Nuclear Regulatory Commission (NRC) Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012
2. NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012
3. Nuclear Energy Institute (NEI) 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012
4. FirstEnergy Nuclear Operating Company's (FENOC's) Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated October 26, 2012

On March 12, 2012, the Nuclear Regulatory Commission (NRC or Commission) issued an order (Reference 1) to FENOC. Reference 1 was immediately effective and directs FENOC to develop, implement, and maintain guidance and strategies to maintain or

Security-Related Information – Withhold Under 10 CFR 2.390
Enclosures Contain Security-Related Information;
Upon Separation from Enclosures, this Cover Letter is Decontrolled

AISI
NRG

Beaver Valley Power Station, Unit Nos. 1 and 2
Davis-Besse Nuclear Power Station
Perry Nuclear Power Plant
L-13-035
Page 2

restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 requires submission of an overall integrated plan by February 28, 2013. The NRC Interim Staff Guidance (ISG) (Reference 2) endorses industry guidance document NEI 12-06, Revision 0 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 3 provides direction regarding the content of this overall integrated plan.

Reference 4 provided the FENOC initial status report regarding mitigation strategies, as required by Reference 1.

The purpose of this letter is to provide the overall integrated plan pursuant to Section IV, Condition C.1 of Reference 1, for Beaver Valley Power Station, Unit Nos. 1 and 2 (BVPS), Davis-Besse Nuclear Power Station (DBNPS), and Perry Nuclear Power Plant (PNPP) (Enclosures A, B, and C, respectively). This letter confirms FENOC has received Reference 2 and has an overall integrated plan developed in accordance with the guidance for defining and deploying strategies that will enhance the ability to cope with conditions resulting from beyond-design-basis external events.

The information in the enclosures provides FENOC overall integrated plans for mitigation strategies pursuant to Reference 3. The enclosed integrated plans are based on conceptual design information. Final design details and associated procedure guidance, as well as any revisions to the information contained in the enclosures, will be provided in the six-month integrated plan updates required by Reference 1.

FENOC requests that the enclosures to this letter, which contain security-related information, be withheld from public disclosure in accordance with 10 CFR 2.390.

This letter contains no new regulatory commitments. If you have any questions regarding these plans, please contact Mr. Thomas A. Lentz, Manager – Fleet Licensing, at 330-315-6810.

Beaver Valley Power Station, Unit Nos. 1 and 2
Davis-Besse Nuclear Power Station
Perry Nuclear Power Plant
L-13-035
Page 3

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 27, 2013.

Respectfully submitted,



Peter P. Sena, III

Enclosures:

- A. Overall Integrated Plan for Beaver Valley Power Station, Unit Nos. 1 and 2
- B. Overall Integrated Plan for Davis-Besse Nuclear Power Station
- C. Overall Integrated Plan for Perry Nuclear Power Station

cc: Director, Office of Nuclear Reactor Regulation (NRR)
NRC Region I Administrator
NRC Region III Administrator
NRC Resident Inspector (BVPS)
NRC Resident Inspector (DBNPS)
NRC Resident Inspector (PNPP)
NRC Project Manager (BVPS)
NRC Project Manager (DBNPS)
NRC Project Manager (PNPP)
Director BRP/DEP (without Enclosures)
Site BRP/DEP Representative (without Enclosures)
Utility Radiological Safety Board (without Enclosures)