

August 21, 2003

Mr. L. William Pearce
Vice President
FirstEnergy Nuclear Operating Company
Beaver Valley Power Station
Post Office Box 4
Shippingport, PA 15077

SUBJECT: SUMMARY OF JULY 10, 2003, CONFERENCE CALL RE: BEAVER VALLEY
POWER STATION, UNIT NOS. 1 AND 2 - RISK-INFORMED INSERVICE
INSPECTION RELIEF REQUEST (TAC NOS. MB5687 AND MB5688)

Dear Mr. Pearce:

The purpose of this letter is to document discussions between the Nuclear Regulatory Commission (NRC) staff and FirstEnergy Nuclear Operating Company (FENOC) representatives on July 10, 2003, on the above subject.

In a July 24, 2002, letter, FENOC submitted a relief request to the NRC to allow implementation of a risk-informed inservice inspection (RI-ISI) program as an alternative to the current American Society for Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, requirements for piping at Beaver Valley Power Station, Unit Nos. 1 and 2 (BVPS-1 and 2). The NRC, following an initial review of this submittal, issued a request for additional information (RAI) on December 30, 2002. Question number seven of that RAI asked whether FENOC had used a method that had been identified by the NRC staff during an audit of another licensee's RI-ISI program. In a February 18, 2003, response to the RAI, FENOC stated that they did use the method in question and stated that the methodology comported with the Westinghouse Owners Group (WOG) Topical Report, WCAP-14572, Revision 1-NP-A, "Westinghouse Owners Group Application of Risk-Informed Methods to Piping Inservice Inspection," methodology.

During a February 20, 2003, conference call, the NRC staff informed representatives of the WOG and Westinghouse (W) that the NRC staff consensus was that the method in question was a deviation and, because of its indeterminate impact on the RI-ISI evaluation, that the deviation was most likely not an acceptable deviation, absent an adequate supporting basis.

In an April 21, 2003, letter to NRC's Director of the Office of Nuclear Reactor Regulation, Sam Collins, W requested that the NRC reevaluate the NRC staff's determination that the proposed methodology was a deviation from the approved WCAP. In response to the W letter, the NRC staff and W met to discuss the issue on May 14, 2003. As documented in the meeting minutes issued June 3, 2003, the NRC staff reaffirmed that the proposed method was a deviation. W proposed to submit to the NRC, "in the near future," an evaluation of the impact of using the deviation to develop an RI-ISI program as compared to using the approved method. The NRC staff agreed to review the evaluation.

During a July 10, 2003, conference call, FENOC staff (and one W representative) indicated that they did not plan any further response for BVPS-1 and 2 to question number seven of the RAI regarding the deviation, but instead would wait until the completion of the W evaluation of the impact of using the deviation in lieu of the approved WCAP. The FENOC staff stated that the BVPS-1 and 2 site will be a part of W's pilot application. The W representative indicated that they were scheduled to complete the evaluation and submit the results to the NRC by mid-November 2003. FENOC staff stated that they needed an RI-ISI program in place by August 2004 to prepare for the BVPS-1 fall outage.

W has expressed confidence that the deviation identified by the NRC staff will be found acceptable. The NRC staff informed FENOC that the review of a generic methodology is typically more time consuming than the review of individual licensing actions and that the NRC staff does not make any guarantees regarding approval of W's proposed method. The NRC staff recommended that FENOC consider that information in weighing its options for the timely completion of the review of the BVPS-1 and 2 RI-ISI relief request.

Sincerely,

/RA/

Timothy G. Colburn, Senior Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-334 and 50-412

cc: See next page

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Timothy G. Colburn, Senior Project Manager, Section 1
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