

August 22, 2007

Mr. Peter P. Sena III
Site Vice President
FirstEnergy Nuclear Operating Company
Beaver Valley Power Station
Mail Stop A-BV-SEB1
P.O. Box 4, Route 168
Shippingport, PA 15077

SUBJECT: BEAVER VALLEY POWER STATION, UNIT NO. 2 - REQUEST FOR
ADDITIONAL INFORMATION REGARDING THE INSERVICE TESTING
PROGRAM THIRD 10-YEAR INTERVAL RELIEF REQUESTS (TAC NOS.
MD5595, MD5600, MD5602, AND MD5603)

Dear Mr. Sena:

By letter dated May 11, 2007, FirstEnergy Nuclear Operating Company (FENOC, licensee) requested approval of proposed alternatives and relief requests associated with the inservice testing (IST) program third 10-year interval update for Beaver Valley Power Station, Unit No. 2 (BVPS-2).

The Nuclear Regulatory Commission (NRC) staff is reviewing the submittal and has determined that additional information is needed to complete its review for relief requests PRR1, PRR6, PRR8, and PRR9. The specific questions are found in the enclosed request for additional information (RAI). The licensee staff indicated that a response to the RAI would be provided within 30 days of receipt.

Please contact me at (301) 415-1016, if you have any questions on this issue.

Sincerely,

/ra/

Nadiyah S. Morgan, Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-412

Enclosure:
RAI

cc w/encl: See next page

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RAI

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ADAMS Accession No: ML072070591

*See memo dated July 16, 2007

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OFFICIAL RECORD COPY

Beaver Valley Power Station, Unit Nos. 1 and 2

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REQUEST FOR ADDITIONAL INFORMATION
RELATED TO THE INSERVICE TESTING PROGRAM, THIRD 10-YEAR INTERVAL
FIRSTENERGY NUCLEAR OPERATING COMPANY
FIRSTENERGY NUCLEAR GENERATION CORP.
OHIO EDISON COMPANY
THE TOLEDO EDISON COMPANY
BEAVER VALLEY POWER STATION, UNIT NO. 2
DOCKET NO. 50-412

By letter dated May 11, 2007, Agencywide Documents Access and Management System (ADAMS) accession number ML071370347, FirstEnergy Nuclear Operating Company (FENOC, the licensee) requested approval of proposed alternatives and relief requests associated with the inservice testing (IST) program third 10-year interval update for the Beaver Valley Power Station, Unit No. 2 (BVPS-2). There was a total of 10 requests submitted. The Nuclear Regulatory Commission (NRC) staff is reviewing the submittal and has the following questions:

Relief Request PRR1

1. The licensee stated, "Lieu of double frequency test requirements specified in ISTB-6200(a) an evaluation and analysis shall be performed per the guidelines provided in ISTB-6200(c)." ISTB-6200(c) specifically states, "In cases where the pump's test parameters are within either the alert or required action ranges, a new set of reference values may be established." Therefore, the use of ISTB-6200(c) is applicable to both alert and required action ranges. Please clarify the need for Relief Request PRR1.

Relief Request PRR6

2. NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants," Revision 1, Section 5.5.2, "Use of Tank Level to Calculate Flow Rate for Positive Displacement Pumps" is the basis for the proposed alternative in the relief request. However, the relief request does not indicate if the diesel fuel oil transfer pumps are positive displacement pumps. Are the diesel fuel oil transfer pumps positive displacement pumps? Please provide another basis for the proposed alternative in the relief request, if the pumps are not positive displacement pumps.

Relief Request PRR8

3. In the last paragraph of the American Society of Mechanical Engineers (ASME) Code Components Affected Section, the licensee stated, "This Request for Relief may also be

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applied to any pump in the Inservice Test (IST) Program scope should a vibration reading of <0.05 in/sec be obtained as a new reference value subsequent to repair or replacement and for pumps that demonstrate a vibration reading of <0.05 in/sec for new comprehensive tests." NUREG/CP-152, "Smooth-Running Pumps," Session 4, Pages 4-32, July 1996, states, "If licensees intend to submit alternative requests to use minimum reference values, the requests should be pump specific and include justification as to how the current inservice testing methodology will detect pump degradation." The NRC staff's position is to review relief requests on a case-by-case basis for a specific requirement of the Code. Generic relief for all pumps cannot be authorized. Generic changes to Code requirements can be achieved through the ASME Code for Operation and Maintenance of Nuclear Power Plants Committee. Therefore, please revise the relief request to delete the last paragraph from the ASME Code Component(s) Affected Section. Also, future relief requests may be submitted to NRC, if historical data of the pump shows that the reference value of vibration is less than 0.05 in/sec.

4. The relief request does not address pump operating speed. Pump operating speed is a critical component in the vibration acceptance criteria. Please provide the operating speed of each pump listed in the relief request.

Relief Request PRR9

5. The licensee stated, "Since suction pressure is typically a small value, it has minimal impact on pump differential pressure." Please provide the typical service water pump suction pressure, discharge pressure, and pressure instrument accuracy.
6. Explain why replacing river level recorder and transmitter with level indication calibrated to 0.5% is considered a hardship or unusual difficulty. Are there any temporary flow instruments that have the accuracy required for the comprehensive test?
7. Please provide a comparison of the Code required values and the proposed values, including the following information: (1) pressure instrument range, (2) referenced value range (established), and (3) effective and actual accuracies of instruments. Provide justification as to why the proposed alternative is acceptable.