

From: [Tobin, Jennifer](#)
To: rpenfield@firstenergycorp.com
Cc: [Lashley, Phil H \(EH\)](#); [McCreary, Dave M \(EH\)](#)
Subject: Beaver Valley Unit 2 - Request for Additional Information - Snubber RR (EPID L-2020-LLR-0050)
Date: Thursday, April 02, 2020 1:09:00 PM

Dear Mr. Penfield,

The NRC received your application for April 1st relief request (ADAMS Accession No. ML20092K031) and have Requests for Additional Information (RAIs) below.

Beaver Valley Unit 2 Relief Request SSR-1, Snubber Testing- Request for Additional Information

1. In Section 5, "Proposed Alternative and Basis for Use," the licensee states the following:
As an alternative to Subsection ISTD-5200 of the OM Code, Energy Harbor Nuclear Corp. proposes to cancel the operational readiness testing of snubbers during the 2R21 refueling outage. Snubber testing to meet Subsection ISTD-5200 will resume during the next scheduled refueling outage 2R22.

Please clarify: The NRC staff does not consider this alternative request to constitute cancellation of the ASME OM Code snubber testing program. The staff considers this alternative request to propose a one-time extension of the ASME OM Code Inservice testing (IST) program for specific snubbers to the next refueling outage in the spring of 2022 in accordance with 10 CFR 50.55a(z)(2) where compliance with these specific IST requirements would result in hardship without a compensating increase in the level of quality and safety.

2. Section 1, "ASME Code Components Affected," lists the snubbers within the scope of the alternative request, including their Service Life Expiration dates. When were these Service Life Expiration dates calculated?
3. In Section 5, the licensee states that snubbers denoted by an asterisk (*) in Section 1 are snubbers that require Service Life Maintenance to be performed during refueling outage 2R21 to extend service life to the date listed. In addition to the snubbers denoted by an asterisk, the staff notes that snubbers 2MSS-PSSP103 and 2MSS-PSSP151B have Service Life Expiration dates in 2022 and 2021, respectively. Are these two snubbers accessible for a visual examination during 2R21?
4. In Section 5, the licensee references IRIS OE 475511 for operating experience regarding the large bore snubbers at the plant. A summary of this operational experience is needed for the NRC to evaluate this request and make a regulatory finding.

In order to meet your targeted completion time of April 4, 2020, please submit your response to this request for additional information by April 3rd. Please request a clarification call on the RAIs (if needed) by COB April 2nd.

If you have questions please don't hesitate to contact me.

Thanks!
-Jenny