From:	Tobin, Jennifer
To:	rpenfield@firstenergycorp.com
Cc:	Lashley, Phil H (EH); McCreary, Dave M (EH)
Subject:	Verbal Relief for Snubbers- Delivered 4/4/2020 at 4:00 pm
Date:	Saturday, April 04, 2020 4:36:00 PM

Good afternoon Mr. Penfield,
Please find below a written documentation of the verbal relief that NRC provided this afternoon (4/4/2020). This email will be made publicly available.

Please contact me with questions or concerns.

Thanks!
-Jenny

VERBAL AUTHORIZATION BY THE NRC OFFICE OF NUCLEAR REACTOR REGULATION
FOR 10 CFR 50.55a REQUEST L-20-118-SRR-1, REVISION 0, SNUBBER TESTING

BEAVER VALLEY POWER STATION, UNIT 2

ENERGY HARBOR NUCLEAR CORPORATION

DOCKET NO. 50-412

April 3, 2020

Technical Evaluation read by Thomas G. Scarbrough, Acting Chief, Mechanical Engineering and Inservice Testing Branch, Division of Engineering and External Hazards, NRC Office of Nuclear Reactor Regulation

By letter dated April 3, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20092K031) and its supplement dated April 3, 2020 (ADAMS Accession No. ML20093G651), Energy Harbor Nuclear Corporation (the licensee) proposed an alternative to specific requirements in the American Society of Mechanical Engineers (ASME) *Code for Operation and Maintenance of Nuclear Power Plants* (OM Code), 2004 Edition through 2006 Addenda, for Beaver Valley Power Station (BVPS), Unit 2, pursuant to Title 10 of the *Code of Federal Regulations*, Part 50, Section 55a (10 CFR 50.55a).

In particular, the licensee submitted 10 CFR 50.55a Request L-20-118-SSR-1, Revision 0, Snubber Testing, on April 3, 2020, requesting NRC authorization for a one-time extension of the operational readiness testing to the next refueling outage (2R22) for 24 specific snubbers in the Inservice Testing (IST) Program at Beaver Valley Unit 2. The NRC staff notes that refueling outage 2R22 for Beaver Valley Unit 2 is scheduled for the fall of 2021. The licensee provided justification that compliance with the requirements in the ASME OM Code, Subsection ISTD, “Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants,” paragraph ISTD-5200, “Inservice Operational Readiness Testing,” to perform certain IST activities for specific snubbers listed in the submittal at this time would result in a hardship without a compensating increase in the level of quality and safety in accordance with 10 CFR

50.55a(z)(2). The licensee indicates that activities for Service Life Monitoring will be performed during refueling outage 2R21, as required, to ensure service life will not be exceeded. The licensee states that inservice testing of Beaver Valley Unit 2 snubbers will resume in alignment with paragraph ISTD-5200 with sampling performed in accordance with the 10 percent plan contained in paragraph ISTD-5300, "The 10% Testing Sample," and the Service Life Monitoring program during refueling outage 2R22.

In its alternative request, the licensee stated that the functional testing of the snubbers specified in the submittal would represent a hardship during this COVID-19 outbreak, because of the potential unavailability of key contract personnel and the potential for exposing plant personnel to contract personnel with various backgrounds during snubber IST activities contrary to COVID-19 health guidance. To support its request for a one-time extension of the operational readiness testing for the specified snubbers, the licensee provides information indicating that the service life of those snubbers extends to at least refueling outage 2R22 in the fall of 2021. The licensee states that the snubbers with service life expiration dates in the years shortly following refueling outage 2R22 will receive service life maintenance or visual examinations during refueling outage 2R21 in April 2020. If maintenance is unsuccessful, the licensee reports that corrective actions will be performed for those snubbers. Further, the licensee states that based on Beaver Valley Unit 2 snubber test history since 2009, there have been approximately 211 tests of program snubbers with only one snubber not meeting its test criteria but was determined to be fully functional in the as-found condition. The licensee states that there have been no dynamic events or transients during plant operation since the previous refueling outage that might affect snubber performance. The licensee reports that there was a recent internal operating experience that applies to one large bore steam generator snubber listed in the submittal that the licensee has addressed in its corrective action program. Overall, the licensee states that the snubber population at Beaver Valley Unit 2 has been operating at a high level of performance for the past ten years.

Based on the information described above for the specific snubbers at Beaver Valley Unit 2 listed in the licensee's submittal, the NRC staff finds that (1) snubber population testing during the past ten years indicates their acceptable historical performance; (2) ongoing inservice visual examination and testing activities have not identified snubber performance concerns, except an operating experience item related to steam generator snubbers that has been addressed by the licensee's corrective action program; (3) service life monitoring of all snubbers is performed every refueling outage and service life maintenance activities will continue as needed; and (4) a hardship exists for certain IST program activities related to these snubbers at this time that would be contrary to the health and safety of plant personnel.

Therefore, the NRC finds that the licensee's proposed alternative for a one-time extension of operational readiness testing for 24 specified snubbers at Beaver Valley Unit 2 in accordance with 10 CFR 50.55a(z)(2) will provide reasonable assurance that the snubbers will be operationally ready to perform their safety functions until the next refueling outage in the fall of 2021. All other ASME OM Code requirements as incorporated by reference in 10 CFR 50.55a for which relief or an alternative was not specifically requested and approved in this subject request remain applicable. If the licensee identifies a performance issue with any of these snubbers, the licensee will be expected to take action to implement the requirements of the ASME OM Code as incorporated by reference in 10 CFR 50.55a. This authorization will remain in effect until restart from the next refueling outage for Beaver

Valley Unit 2 in the fall of 2021. The licensee's testing plans for these snubbers may be adjusted as appropriate by any subsequent NRC-authorized alternative requests.

Authorization read by James Danna, Chief of the Plant Licensing Branch I, Office of Nuclear Reactor Regulation

As Chief of the Plant Licensing Branch I, Office of Nuclear Reactor Regulation, I agree with the conclusions of the Mechanical Engineering and Inservice Testing Branch.

The NRC staff concludes that the proposed relief for Beaver Valley, Unit 2 will provide reasonable assurance of adequate safety until the next scheduled refueling outage in the fall of 2021 when operational readiness testing for 24 specified snubbers may be performed.

The NRC staff finds that complying with the requirements of the ASME OM Code, Subsection ISTD, as required by 10 CFR 50.55a, would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. Accordingly, the NRC staff concludes that the licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(z)(2).

Therefore, effective April 4, 2020, the NRC authorizes the use of the proposed alternative at Beaver Valley, Unit 2 until completion of the next scheduled refueling outage, scheduled for the fall of 2021. All other requirements in ASME OM Code for which relief was not specifically requested and approved in this relief request remain applicable.

This verbal authorization does not preclude the NRC staff from asking additional clarification questions regarding the proposed relief while subsequently preparing the written safety evaluation.