

From: Tobin, Jennifer
To: rpenfield@firstenergycorp.com
Cc: [Lashley, Phil H.](#); [McCreary, Dave M \(EH\)](#)
Subject: Verbal Relief for MOVs- Delivered 4/4/2020 at 4:00 pm
Date: Saturday, April 04, 2020 4:30:00 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-20-116-VRR6, REVISION 0, MOTOR-
OPERATED VALVE TEST FREQUENCY

BEAVER VALLEY POWER STATION, UNIT 2

ENERGY HARBOR

DOCKET NO. 50-412

APRIL 4, 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 1, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20092K723), Energy Harbor (the licensee) proposed an alternative to specific requirements in the American Society of Mechanical Engineers (ASME) *Code for Operation and Maintenance of Nuclear Power Plant (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 Number L-20-116-VRR6, Revision 0, Motor-Operated Valve Test Frequency on April 1, 2020, requesting NRC authorization to extend the performance of diagnostic testing for 15 specific motor-operated valves (MOVs) at Beaver Valley Unit 2 listed in the request from the upcoming refueling outage (2R21) scheduled to begin on April 12, 2020, to the following refueling outage (2R22) planned for the fall of 2021. The licensee provided justification that compliance with the provisions in ASME OM Code Case OMN-1, "Alternative Rules for Preservice and Inservice Testing of Active Electric Motor-Operated Valve Assemblies in Light-Water Reactor Power Plants," which is accepted in NRC Regulatory Guide (RG) 1.192, "Operation and Maintenance Code Case Acceptability, ASME OM Code," as incorporated by reference in 10 CFR 50.55a, to conduct diagnostic testing of the MOVs 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).

In its alternative request, the licensee stated that the performance of diagnostic testing of the MOVs listed in the request at this time at Beaver Valley Unit 2 would represent a hardship during this COVID-19 outbreak, because the licensee intends to reduce the amount of personnel on site to prevent the spread of COVID-19 at BVPS. The licensee is also contingency planning in case some of its workforce becomes unavailable due to the COVID-19 outbreak. To support its request to extend the diagnostic testing of the MOVs until the next refueling outage in the fall of 2021, the licensee provided the functional margin between valve operating requirements and the available actuator output capability

to satisfy the acceptance criteria for operational readiness for each specific MOV, along with the probabilistic risk assessment (PRA) ranking and exercise testing frequency. The licensee provided information indicating that each of the specified MOVs has a functional margin of at least 10 percent, based on the test data obtained during refueling outage 2R15 in March 2011. The licensee also states that all of the specified MOVs (except for the four butterfly valves) will have their valve stems cleaned and lubricated during refueling outage 2R21. The licensee notes that the grace period allowed in ASME OM Code Case OMN-20, "Inservice Test Frequency," which is accepted in RG 1.192 as incorporated by reference in 10 CFR 50.55a, is insufficient to extend the diagnostic test interval for these MOVs until refueling outage 2R22. The licensee considers that the MOVs will remain operationally ready based on (1) the short 1.5-month diagnostic test extension from the ASME OM Code Cases OMN-1 and OMN-20 test schedules; (2) the available MOV functional margin; (3) exercising of these MOVs at least each refueling outage or 18 months; and (4) the planned stem lubrication maintenance.

Based on the information described above for the 15 MOVs at Beaver Valley Unit 2 identified in the licensee's submittal, the NRC staff finds that (1) previous diagnostic testing of those MOVs indicates their acceptable historical performance; (2) ongoing IST activities have not identified MOV performance concerns; (3) periodic maintenance activities will continue; and (4) a hardship exists for the performance of team-oriented diagnostic testing of these MOVs 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 the diagnostic testing interval for the specified 15 MOVs at Beaver Valley Unit 2 in accordance with 10 CFR 50.55a(z)(2) will provide reasonable assurance that the MOVs 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 MOVs, the licensee will be expected to take action to implement the requirements of its Technical Specifications. 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 MOVs 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 diagnostic testing for 15 specific motor-operated valves MOVs may be performed.

The NRC staff finds that complying with the requirements of the ASME OM Code, 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.