

Darin M. Benyak
Vice President, Fleet Nuclear Operations

330-436-1380

September 28, 2020
L-20-256

10 CFR 50.55a

Attn: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT:

Beaver Valley Power Station, Unit Nos. 1 and 2
Docket No. 50-334, License No. DPR-66
Docket No. 50-412, License No. NPF-73
Davis-Besse Nuclear Power Station, Unit No. 1
Docket No. 50-346, License No. NPF-3
Perry Nuclear Power Plant, Unit No. 1
Docket No. 50-440, License No. NPF-58
Request to Use Provision in Later Edition of the ASME Boiler and Pressure Vessel Code, Section XI

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(4)(iv), and NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," Dated July 28, 2004, Energy Harbor Nuclear Corp. requests Nuclear Regulatory Commission (NRC) approval to use a specific provision of a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, for the units identified above. Specifically, Energy Harbor Nuclear Corp. requests approval to use IWA-4540(b) of the 2017 Edition of the ASME B&PV Code.

Energy Harbor Nuclear Corp. requests approval of this request by January 29, 2021 to support spring outages.

There are no regulatory commitments in this submittal. If there are any questions or if additional information required, please contact Phil H. Lashley, Manager – Fleet Licensing, at (330) 696-7208.

Respectfully,



Benyak, Darin 48813
Sep 28 2020 8:14 AM

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Darin M. Benyak

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Enclosure: 10 CFR 50.55a(g)(iv) Request 20-027, Revision 0

cc: NRC Regions I Administrator
NRC Regions III Administrator
NRC Resident Inspector – Beaver Valley
NRC Resident Inspector – Davis-Besse
NRC Resident Inspector – Perry
NRR Project Manager – Energy Harbor Nuclear Corp. Fleet
Director BRP/DEP
Site BRP/DEP Representative
Executive Director, Ohio Emergency Management Agency,
State of Ohio (NRC Liaison)
Utility Radiological Safety Board

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Enclosure

Beaver Valley Power Station, Unit Nos. 1 and 2
Davis-Besse Nuclear Power Station, Unit No. 1
Perry Nuclear Power Plant, Unit No. 1

10 CFR 50.55a(g)(4)(iv) Request 20-027, Revision 0

(2 Pages follow)

Proposed Use of Subsequent ASME Code Edition and Addenda
in Accordance with 10 CFR 50.55a(g)(4)(iv)

1. ASME Code Component(s) Affected:

Class 1, 2, and 3 items located in the American Society of Mechanical Engineers, Boiler and Pressure Vessel Code (ASME Code) Section XI boundaries.

2. Applicable Code Edition and Addenda:

<u>PLANT</u>	<u>ISI INTERVAL</u>	<u>ASME CODE EDITION</u>	<u>INTERVAL START</u>	<u>INTERVAL SCHEDULED END</u>
Beaver Valley Power Station, Unit No. 1	5	2013 Edition, No Addenda	08/29/2018	08/28/2028
Beaver Valley Power Station, Unit No. 2	4	2013 Edition, No Addenda	08/29/2018	08/28/2028
Davis-Besse Nuclear Power Station, Unit No. 1	4	2007 Edition through 2008 Addenda	09/21/2012	09/20/2022
Perry Nuclear Power Plant, Unit No.1	4	2013 Edition, No Addenda	05/18/2019	05/17/2029

3. Proposed Subsequent Code Edition and Addenda (or Portion):

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(4)(iv) and the guidance provided in Nuclear Regulatory Commission (NRC) Regulatory Issue Summary 2004-12 (Reference 1), Energy Harbor Nuclear Corp. requests NRC approval to use specific provisions of a later edition of the ASME Code, Section XI, for Davis-Besse Nuclear Power Station, Unit No. 1 (DBNPS), Perry Nuclear Power Plant, Unit No. 1 (PNPP), and Beaver Valley Power Station, Unit Nos. 1 and 2 (BVPS).

BVPS and PNPP perform Repair/Replacement activities in accordance with a fleet program based on the 2013 Edition of ASME Code, Section XI. DBNPS performs Repair/Replacement activities in accordance with a fleet program based on the 2007 Edition through the 2008 Addenda of ASME Code, Section XI.

Pursuant to 10 CFR 50.55a(g)(4)(iv), Energy Harbor Nuclear Corp. requests approval to use IWA-4540(b) from the ASME Code, 2017 Edition. This subparagraph outlines items that are exempt from pressure testing after repair/replacement activities.

Paragraph 10 CFR 50.55a(a) incorporates by reference the ASME Code, Section XI, 1977 Edition through the 2017 Edition. Therefore, IWA-4540(b) of the 2017 Edition of ASME Code Section XI, is included in the list of editions and addenda incorporated by reference in the current edition of 10 CFR 50.55a(a).

4. Related Requirements:

10 CFR 50.55a(g)(4)(iv) states:

Inservice examination of components and system pressure tests may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (a) of this section, subject to the conditions listed in paragraph (b) of this section, and subject to Commission approval. Portions of editions or addenda may be used, provided that all related requirements of the respective editions or addenda are met.

10 CFR 50.55a(b)(2) incorporates by reference Section XI, Division 1, of the ASME Code 2017 Edition as approved in Reference 2. There are no related requirements or applicable conditions in 10 CFR 50.55a(b) or the ASME Code 2017 Edition associated with subparagraph IWA-4540(b).

5. Duration of Proposed Request:

The duration of this request is the remainder of each plant's current inservice inspection interval listed above in Section 2, "Applicable Code Edition and Addenda."

6. References:

1. NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," dated July 28, 2004
2. American Society of Mechanical Engineers 2015–2017 Code Editions Incorporation by Reference, 85 FR 26540, dated May 4, 2020