March 7, 2000

MEMORANDUM TO: File Center

FROM: Daniel Collins, Project Manager, Section 1 ***/RA/***
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: BEAVER VALLEY 1 AND 2, DRAFT REQUEST FOR ADDITIONAL INFORMATION REGARDING CHARCOAL TESTING TECHNICAL SPECIFICATION AMENDMENTS (TAC NOS. MA6758 AND MA6759)

The attached draft request for additional information (RAI) was transmitted by electronic mail on February 28, 2000, to John Maracek of FirstEnergy Nuclear Operating Company (the licensee) in preparation for an upcoming conference call between the Nuclear Regulatory Commission (NRC) staff and the licensee. The purposes of the conference call are to (1) briefly review the items so that the staff may provide any needed clarification of the information sought, and (2) allow the licensee to determine and agree upon a schedule to respond to the RAI. This memorandum and the attachment do not convey a formal request for information or represent an NRC staff position.

Docket Nos. 50-334 and 50-412

Attachment: As stated

Contact: D. Collins, NRR
301-415-1427

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The NRC staff has been reviewing Duquesne Light Company's (DLC's) letters dated September 20, 1999 (L-99-145), and November 19, 1999 (L-99-157), which submitted changes to the Technical Specification (TS) requirements for testing ventilation charcoal, and a response to Generic Letter 99-02, " Laboratory Testing of Nuclear Grade Activated Charcoal," respectively. The staff would like to discuss the following items which were identified during review of these letters:

For the two systems in each unit identified as requiring TS amendments, i.e., the Supplementary Leak Collection and Release System (SLCRS) and the Control Room Emergency Ventilation System (CREVS), as applicable, please provide the following information:

(1) Provide the credited efficiency values for all systems used in the accident analyses, both current and proposed.

(2) Provide the required TS safety factors for all system charcoal tests, both current and proposed.

(3) GL 99-02 allows enforcement discretion for the adoption of ASTM D3803-1989 standard with a safety factor as low as 2. In L-99-157 letter, it appears that you are using a safety factor of less than 2 which is unacceptable. Provide information indicating that you are adopting ASTM D3803-1989 with a safety factor as low as 2 or address GL 99-02 Requested Action 3.

(4) GL 99-02 states that humidity control can be provided by heaters or an NRC-approved analysis that demonstrates that the air entering the charcoal will be maintained less than or equal to 70 percent relative humidity under worst-case design-basis conditions.

In the TS changes, the heater output for the Emergency Ventilation Systems, i.e, both CREVS and SLCRS, is revised from the current (4.5 to 5.5 kw) to the proposed (3.87 to 5.5 kw). In L-99-145, pages B-2 and B-3, it is stated that the new heater ratings are based on recent calculations for the Control Rooms. No justification for the Unit 1 or Unit 2 SLCRS has been noted in the licensee's submittal.

Provide the assumptions and calculation details justifying these changes in the heater ratings for both the CREVS and the SLCRS for both units.

(5) Requested Action 3 of GL 99-02 states that if a licensee chooses to test its charcoal samples at different test conditions than specified in ASTM D3803-1989, then that test should be treated as an alternate protocol and address Requested Action 3. Please justify the following deviations from ASTM D3803-1989:

(a) The proposed test temperature for all ESF systems has a tolerance of ±½° C which is higher than the tolerance value in the ASTM D3803-89.

(b) The face velocities for all four systems have a tolerance of ±20% which is higher than the tolerance value in the ASTM D3803-89.

(c) For the Unit 1 SLCRS TS 4.7.8.1.b.3, the adsorbate concentration is .05 to 0.15 mg/M^3 which is less than the ASTM D3803-89 value of 1.75 ±0.25 mg/M^3.