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

Subject: Beaver Valley Power Station, Unit No. 2
Docket No. 50-412, License No. NPF-73
Commitment Changes and
Report of Facility Changes, Tests and Experiments

In accordance with 10 CFR 50.59(d)(2), the Report of Facility Changes, Tests, and Experiments for the Beaver Valley Power Station Unit No. 2 is provided as Attachment 1. This report provides a brief description of facility and procedure changes which required a 50.59 evaluation and a summary of each evaluation. The report covers the period of February 28, 2002, through October 11, 2003, which corresponds to a period ending with Fuel Cycle 10.

Two commitment changes are described in Attachment 2, and are forwarded as part of this submittal in accordance with the NRC endorsed guidance of the Nuclear Energy Institute (NEI) related to the commitment change process (Reference: NEI 99-04). There are no regulatory commitments contained in this letter or Attachment 1.

If you have any questions regarding this report, please contact Mr. Larry R. Freeland, Manager, Regulatory Affairs/Performance Improvement at 724-682-5284.

Sincerely,

L. William Pearce

Attachments

c: Mr. T. G. Colburn, NRR Senior Project Manager
Mr. P. C. Cataldo, NRC Sr. Resident Inspector
Mr. H. J. Miller, NRC Region I Administrator

Change Title

ECP 02-0253 – Replacement of SWS 6" Supply & Return Headers to the Control Room Chillers

Change

This Engineering Change Package (ECP) replaced the 6 inch supply and return headers from the Service Water System (SWS) valve pit to the Unit 2 control room chillers. The 6 inch lines were replaced with 4 inch. The replaced piping was capped and abandoned in place (at least 10 feet below ground.) Replacement piping was installed and buried 5 feet (minimum) below ground with connections at the SWS valve pit and the Unit 2 Control Building Equipment Room. Additionally access plugs in the SWS valve pits were required to be removed to facilitate installation of the new piping. These access plugs (2 ft thick concrete) provide tornado-missile protection for Safety Related components. This evaluation was for the removal of access plugs in the SWS valve pits, soil excavation, and maintenance of the Control Room Pressure Boundary (CRPB).

A contingency plan of action was provided for refilling the excavation in the event of a pending tornado and restoring the missile protection/soil cover. Additionally, a contingency plan of action was provided for reinstallation of the access plugs in the SWS valve pits in the event of a pending tornado. A temporary enclosure was required to maintain the CRPB integrity. CRPB integrity was maintained by controlling work inside the temporary enclosure with either supply or return lines being replaced one at a time. The enclosure was tested for air leakage.

Change Title

ECP 02-0225 – Install Pipe Spool Piece with Flange to Facilitate Removal of 2SWS-106

Change

This Engineering Change Package (ECP) installed a pipe spool piece with flanges on a 30-inch Service Water System (SWS) header downstream of check valve 2SWS-106. The spool piece was installed to facilitate removal of valve 2SWS-106 for inspection. The header is located in a SWS valve pit. An access plug in the SWS valve pit was temporarily removed to facilitate removal of the valve and installation of the new spool piece. The access plug (2ft thick concrete) provides tornado-missile protection for Safety Related components. Therefore, an evaluation was necessary for the temporary removal of the access plug in the SWS valve pit. During the installation period a contingency plan of action was provided for reinstalling the access plug in the event of a pending tornado.

Change Title

Small Break LOCA Peak Clad Temperature Re-Analysis

Change

Peak clad temperature (PCT) for a small break LOCA event has been reanalyzed due to an accumulation of small break LOCA model changes and errors previously reported in accordance with 10 CFR 50.46 (reference FENOC letter L-03-176) and also to reflect the 1.4% uprated power level previously approved by the NRC. Because the analysis did not incorporate any changes to the plant that are not already NRC approved and because incorporation of the small break LOCA model changes and errors produced a calculated PCT less than the regulatory limit, it was determined that a license amendment was not required.

Change Title

Elimination of Commitments Made in Response to Generic Letter 88-14 Involving Frequency for Instrument Air System Air Quality Testing

Change

A letter to the NRC dated July 25, 1991 modified the response to Generic Letter 88-14. The frequency of testing for air quality was changed to monthly for dew point and particulate testing and to quarterly for flammable gasses and oil.

Generic Letter 88-14 does not require continued testing at any frequency or at any specific location to ensure the quality of the air. The purpose of the Generic Letter was to ensure that the components served by the instrument air system receive the quality of air necessary for them to fulfill their safety functions by performing a design and operations verification of the instrument air system.

The verification and several plant modifications were completed at both units to ensure the instrument air systems could provide quality air, as documented in the correspondence to the NRC. Testing of the air quality has been performed monthly. The quality of the air has been consistently acceptable for the various subsystems. In addition, dew point meters are installed for station instrument air systems and are monitored by the System Engineer as part of the walkdowns. The carbon steel piping is being replaced to eliminate sources of particulate. Periodic testing is considered prudent and will continue to be performed to ensure the quality of the air remains acceptable and to trend the performance of the various components within the instrument air systems.

Change Title

Revision of Requirements to Allow a Preventive Maintenance Task to Enter the Performance Grace Period or To Exceed a Limit Date

Change

A letter to the NRC dated June 2, 2000 (Reference Letter Number L-00-073), made reference to site requirements for Preventive Maintenance (PM) task deferral which included completion of a PM deferral form to be approved by the Maintenance Director and Plant General Manger, and initiation of a condition report prior to the PM task entering the allowable grace period. Site Vice President approval on the PM deferral form was also required if a PM task was deferred past its limit or late date.

Since the implementation of these controls, the performance of PM tasks by their scheduled date has improved and the expectations are being fulfilled. FENOC common process procedure NOP-WM-3001, "Preventive Maintenance Program," is now used to control PM task deferral.

The change relaxes the administrative requirements for allowing a PM to go past its normally scheduled due date with requirements that are typical of FENOC and industry practices. The procedure provides that use of PM task deferral is to be minimized. PM tasks may be scheduled into the approved grace period to align with the schedule and available maintenance manpower without the administrative burden of processing a deferral form and a condition report. A condition report will continue to be generated if there is more than one deferral beyond the late date for the same PM work order.