**FENOC**
FirstEnergy Nuclear Operating Company

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February 14, 2007
L-07-025

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

**Subject: Beaver Valley Power Station, Unit No. 2**
**Docket No. 50-412, License No. NPF-73**
**Proposed Alternative to American Society of Mechanical Engineers Code Section XI Repair Requirements (Request No. BV2-PZR-01)**

This letter forwards information about the acceptance standard used for surface examinations associated with completed weld overlays applied to pressurizer nozzles at FirstEnergy Nuclear Operating Company's (FENOC) Beaver Valley Power Station Unit No. 2 during the October 2006 maintenance and refueling outage. The information was requested by the U.S. Nuclear Regulatory Commission (NRC) staff during a January 26, 2007 conference call with FENOC personnel.

Surface examination acceptance criteria for the completed weld overlays and adjacent base metal were identified in a March 31, 2006 FENOC letter (L-06-038) along with other alternatives to American Society of Mechanical Engineers (ASME) Code Section XI repair requirements (Request No. BV2-PZR-01). Specifically, Table 3 of the March 31, 2006 letter specified the use of ASME Code Case N-504-2, Paragraph (i) as the acceptance criteria for the surface (dye penetrant) examinations. ASME Code Case N-504-2, Paragraph (i) invokes the use of ASME Code Section XI, Paragraph IWB-3514-2.

Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1," Revision 14 indicates that ASME Code Case N-504-2 is acceptable with the condition that ASME Code Section XI, Nonmandatory Appendix Q, "Weld Overlay Repair of Class 1, 2, and 3 Austenitic Stainless Steel Piping Weldments," must also be met. Appendix Q, Section Q-4100, Paragraph (b) requires that surface examinations of the completed overlay and adjacent base material meet the acceptance criteria of ASME Code Section III, Construction Code, Sections NB-5300 and NB-2500, respectively.

The procedures governing the surface (dye penetrant) examinations of the completed weld overlays and adjacent base material used at Beaver Valley Power Station Unit No. 2 applied the ASME III Construction Code acceptance criteria, as required by Appendix Q. Using these criteria, the examinations identified no relevant indications

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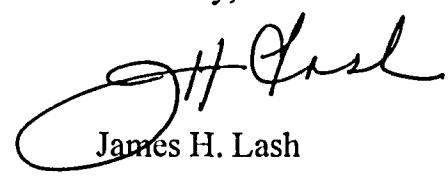
(none greater than one sixteenth inch) in any of the completed weld overlays or adjacent base material.

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Henry L. Hegrat, Supervisor FENOC Fleet Licensing at (330) 315-6944.

Sincerely,



James H. Lash

c: Ms. N. S. Morgan, NRR Project Manager
Mr. P. C. Cataldo, NRC Senior Resident Inspector
Mr. S. J. Collins, NRC Region I Administrator
Mr. D. A. Allard, Director BRP/DEP
Mr. L. E. Ryan (BRP/DEP)