

**PROPOSED RESPONSE TO TWO ADDITIONAL QUESTIONS**  
**REQUEST FOR ADDITIONAL INFORMATION (RAI) REGARDING BEAVER VALLEY**  
**UNIT Nos. 1 AND 2 LICENSE AMENDMENT REQUESTS Nos. 334 (UNIT 1) AND 205 (UNIT 2) :**

NOTE: The following responses are applicable to Beaver Valley Power Station Unit 1 only.

**(1) In responses to questions 3 and 4, the edition of ASME B&PV Code, Section III, Div. 1, Subsection NF utilized was 2004 Edition including Addenda 2005, while 10 CFR 50.55a(b)(1) allows Edition 2001 through 2003 Addenda. This needs to be addressed.**

The existing containment sump screen assembly consists of three sections: inclined grating and two stages of screening. The superstructure that supports the grating and screening is a platform that also provides support for the Inside Recirculation Spray (RS) Pumps, the normal sump pumps and associated piping as well as other appurtenances. Portions of the existing sump screen assembly (which consists of the majority of the grating, and the screening) will be removed and replaced with a new containment sump strainer. The new containment sump strainer assembly consists of three interconnected components: modules, a channel box, and a suction box. The modules, channel box (including their support frames) and suction box assemblies, are primarily made from plates or shells. The superstructure which provides component support functions will remain in place.

The ASME Section III edition to be used for components and systems required to be designed, fabricated, and installed to ASME requirements is governed by 10 CFR 50.55a(b)(1). However, the use of ASME III Subsection NF is not *required* for design of the Beaver Valley Power Station strainer components. ASME III Subsection NF was selected to take advantage of design techniques more appropriately suited for plate and shell design of the new strainer, versus the post and beam type design used for the existing screens. The new strainer does not provide any support function for any pumps or piping. The superstructure used for the existing screens will continue to provide the pump and piping support. The Unit 1 LHSI & RS piping is designed to ANSI B31.1.0, 1967 Edition through June 30, 1971 Addenda, with no requirements for the use of ASME III Subsection NF for support design.

There is no specific method of evaluation discussed within the UFSAR on the design of the containment sump strainer assembly in regards to any design feature. The new strainer components are designed to conform to the ASME III Subsection NF Code, however neither the existing strainer nor the new strainer is designated as an ASME III component.

A comparison of the allowable limit equations identified in the vendor analysis, which used the 2004 Edition including 2005 Addenda of the ASME III, Division 1, Subsection NF Code, was performed against the 1998 Edition. The comparison determined that there is no significant difference in any equation used, concluding that the results would not be affected by using the earlier Code Edition. The comparison of the analysis against the earlier Code will be documented in the design package as part of the normal modification process prior to operational acceptance of the modification.

**(2) Response to question 4: The remaining margin (provided in attachment 3) for some of the anchor bolts is only 2.7%. If these margins are preliminary and are likely to change, are the loading changes on these anchor bolts expected to increase?**

The design analyses for the anchor bolts have been performed. Field conditions may result in minor relocation of the anchor bolts. The impact of any deviation beyond the allowable installation tolerances from the analyzed design will be evaluated for impact. The anchoring of the strainer assembly to the floor is by under-cut, bearing type anchors. If the loads on the anchors change due to field obstructions that require relocation, or due to any changes to the structure that result in increased loads on the anchors, the impacts will be fully evaluated and reconciled prior to placing the strainer into operational service. The design allowable loads for the anchor bolts will not be exceeded.