

**Peter P. Sena III**  
Site Vice President724-682-5234  
Fax: 724-643-8069August 22, 2008  
L-08-226

10 CFR 54

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

## SUBJECT:

Beaver Valley Power Station, Unit Nos. 1 and 2  
BV-1 Docket No. 50-334, License No. DPR-66  
BV-2 Docket No. 50-412, License No. NPF-73  
Reply to Request for Additional Information for the Review of the Beaver Valley Power Station, Units 1 and 2, License Renewal Application (TAC Nos. MD6593 and MD6594) and License Renewal Application Amendment No. 21

Reference 1 provided the FirstEnergy Nuclear Operating Company (FENOC) License Renewal Application (LRA) for the Beaver Valley Power Station (BVPS). Reference 2 requested additional information from FENOC regarding the BVPS aging management programs in Section B.2 of the BVPS LRA.

The Attachment provides the FENOC reply to the U.S. Nuclear Regulatory Commission request for additional information. The Enclosure provides Amendment No. 21 to the BVPS License Renewal Application.

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Clifford I. Custer, Fleet License Renewal Project Manager, at 724-682-7139.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 22, 2008.

Sincerely,



Peter P. Sena III

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NR

Beaver Valley Power Station, Unit Nos. 1 and 2

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References:

1. FENOC Letter L-07-113, "License Renewal Application," August 27, 2007.
2. NRC Letter, "Request for Additional Information for the Review of the Beaver Valley Power Station, Units 1 and 2, License Renewal Application (TAC Nos. MD6593 and MD6594)," May 22, 2008.

Attachment:

Reply to Request for Additional Information Regarding Beaver Valley Power Station, Units 1 and 2, License Renewal Application, Section B.2

Enclosure:

Amendment No. 21 to the BVPS License Renewal Application

cc: Mr. K. L. Howard, NRC DLR Project Manager  
Mr. S. J. Collins, NRC Region I Administrator

cc: w/o Attachment or Enclosure  
Mr. B. E. Holian, NRC DLR Director  
Mr. D. L. Werkheiser, NRC Senior Resident Inspector  
Ms. N. S. Morgan, NRC DORL Project Manager  
Mr. D. J. Allard, PA BRP/DEP Director  
Mr. L. E. Ryan, PA BRP/DEP

ATTACHMENT  
L-08-226

Reply to Request for Additional Information Regarding  
Beaver Valley Power Station, Units 1 and 2,  
License Renewal Application,  
Section B.2  
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**Section B.2**

**Question RAI B.2-1**

The “operating experience” element for several new programs states that this is a new program and that there is no plant-specific program operating experience. An example of this is B.2.15, “External Surfaces Monitoring.” Other new programs identify recent operating experience such as a 2003 incidence of a leaking service water pipe discussed in B.2.8, “Buried Piping and Tanks Inspection. However, the staff noted that some new programs do not identify recent operating experience. An example of this is B.2.22, “Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Component.” B.2.22 states that a 1999 internal inspection of a tank visually indicated that the protective coating was not degraded; however, rust scale was found on the tank bottom. Please discuss recent observed material degradation during the implementation of other existing activities that relate to the aging effects that will be managed by the new program and provide the results in the “operating experience” element for that new program. Additionally, as stated in SRP-LR, Appendix A.1.2.3.10.2, please include a commitment to provide operating experience in the future for new programs to confirm their effectiveness.

**RESPONSE RAI B.2-1**

**Part 1 – Discuss recent observed material degradation during the implementation of other existing activities that relate to the aging effects that will be managed by the new program and provide the results in the “operating experience” element for that new program:**

The new aging management programs described in Beaver Valley Power Station (BVPS) License Renewal Application (LRA), Appendix B, “Aging Management Programs,” that include summaries of operating experience are:

- B.2.8—Buried Piping and Tanks Inspection;
- B.2.21—Inaccessible Medium Voltage Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements;
- B.2.22—Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components; and,

- **B.2.31—One-Time Inspection of ASME Code Class 1 Small-Bore Piping**

For the remainder of the new aging management programs described in BVPS LRA, Appendix B, a search of condition reports was performed for examples of operating experience related to program materials, environments, aging effects managed, or proposed aging management techniques. For each of these programs, if applicable operating experience was found, an operating experience summary is provided below. These operating experience summaries are provided in addition to the existing operating experience statements found in Appendix B of the LRA. LRA Section B.2.8 (from the list, above) is included in the following discussion because the program information lacks an operating experience incorporation statement that is consistent with the operating experience incorporation statement included in the other aging management programs. Also, because of the NRC request for recent operating experience, additional recent operating experience is provided in the following discussion for LRA Section B.2.22, "Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components," (also from the list, above).

#### **B.2.8—Buried Piping and Tanks Inspection**

The BVPS LRA states that, "*The BVPS Buried Piping and Tanks Inspection Program will incorporate plant-specific and industry operating experience in the selection of piping or tanks for inspection.*" This statement differs from the operating experience incorporation statement in other new aging management programs. Therefore, the BVPS LRA is revised to include an operating experience incorporation statement consistent with the corresponding statement in the other new aging management programs.

See the Enclosure to this letter for the revision to the BVPS LRA.

#### **B.2.10—Electrical Cable Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements One-Time Inspection**

The Electrical Cable Connections not Subject to 10 CFR 50.49 Environmental Qualification Requirements One-Time Inspection Program requires a one-time inspection of electrical cable connections to verify that cable connections are not loosening due to aging.

A 2001 BVPS condition report identified the failure of a motor lead cable to lug connection and nearby lug joint due to long-term heating and corrosion. The corrective actions from the condition report included an extent of condition inspection of similar motor lead cable to lug connections; this inspection determined that the connections were satisfactory. Additionally, a self-assessment of the entire splice program, including engineering specifications, procedures, work practices, training, and stock review was performed. The self-assessment identified areas of concern and improvement that were entered into and resolved through the FirstEnergy Nuclear Operating Company (FENOC)

Corrective Action Program. The corrective actions from the self-assessment resulted in revisions to work and training procedures, drawing changes, stock procurement practices, and increased site awareness.

The BVPS LRA states that, "*Industry and plant-specific operating experience will be evaluated in the development and implementation of this program. Future operating experience will be appropriately incorporated into the program.*" This second statement differs slightly from the similar statement in other new aging management programs. Therefore, the BVPS LRA is revised to make this operating experience statement consistent with the corresponding statement in the other new aging management programs.

See the Enclosure to this letter for the revision to the BVPS LRA.

#### **B.2.11—Electrical Cables and Connections not Subject to 10 CFR 50.49 Environmental Qualification Requirements**

The Electrical Cables and Connections not Subject to 10 CFR 50.49 Environmental Qualification Requirements program requires visual inspection of electrical cables and connections that are exposed to adverse localized environments.

In response to operating experience from Turkey Point Unit 3, a walkdown of the BVPS Unit 2 cables in the Pressurizer area was conducted during the Cycle 11 refueling outage (Spring 2005) to look for visual effects of cable overheating that causes the jacket and / or insulation to become brittle. No deficiencies were noted.

In 2001, severely burned and cracked wiring was identified on an equipment field cable due to excess cable coming in contact with a hot relief valve. The condition was entered into the FENOC Corrective Action Program. The cable condition was evaluated, replaced and secured to prevent reoccurrence.

The BVPS LRA states that, "*Industry and plant-specific operating experience will be evaluated in the development and implementation of this program. As additional operating experience is obtained, lessons learned will be appropriately incorporated into the program.*"

#### **B.2.12—Electrical Cables and Connections not Subject to 10 CFR 50.49 Environmental Qualification Requirements Used in Instrumentation Circuits**

The purpose of this aging management program will be to demonstrate that sensitive (high voltage – low current applications) instrument cables and connections susceptible to aging effects caused by exposure to adverse localized environments caused by heat, radiation, and moisture will be adequately managed so that there is reasonable assurance that the cables and

connections will perform their intended function in accordance with the current licensing basis during the period of extended operation.

During the periodic testing of Nuclear Instrumentation System detectors and associated field cabling, several connectors have been found with a degraded condition. These connectors were repaired or replaced and returned to service. A BVPS engineering change package (ECP) documents that Amphenol triaxial connectors used on the field cables associated with the Unit 1 neutron detectors become degraded due to radiation, heat and high humidity resulting in system noise. Westinghouse recommended changing the connectors to a Westinghouse Crimp-On type that has greater resistance to neutron radiation. The ECP approved replacement of the subject Amphenol connectors with the Crimp-On type as a design equivalent change. The field cables associated with the Unit 2 neutron detectors already use the Westinghouse Crimp-On type connector.

To date, there has been no BVPS plant-specific operating experience identified for instances of age-related degradation of the electrical cables and connections associated with radiation monitoring (outside Containment).

The BVPS LRA states that, "*Industry and plant-specific operating experience will be evaluated in the development and implementation of this program. As additional operating experience is obtained, lessons learned will be appropriately incorporated into the program.*"

#### **B.2.13—Electrical Wooden Poles/Structures Inspection (Unit 2 only)**

For aging management, this program will inspect for loss of material, reduced circumference, and moisture intrusion, change in material properties due to moisture damage, and visual inspection of the cross-arms, guys, hardware, static supports, and insulators.

To date, there has been no BVPS plant-specific operating experience identified for instances of age-related degradation of electrical wooden poles/structures.

The BVPS LRA states that, "*Industry and plant-specific operating experience will be evaluated in the development and implementation of this program. As additional operating experience is obtained, lessons learned will be appropriately incorporated into the program.*"

#### **B.2.15—External Surfaces Monitoring**

The results of existing surveillance tests, preventive maintenance programs, and system walk-downs provide relevant operating experience for this new program. Visual inspection techniques are well proven in the industry and have been demonstrated as an effective means for detecting degradation.

Corrosion of external surfaces has been reported in the course of performing surveillance tests, preventive maintenance programs, and system walk-downs at BVPS. When found, corrosion of external surfaces was documented, dispositioned, corrected (as applicable), and trended using the FENOC Corrective Action Program.

For example, in 2006, a walkdown of the BVPS Service Water System identified a very small leak in the Service Water one-inch diameter piping. The leakage rate was estimated to be less than one drip per minute, with no spray that could impact other equipment. A condition report was written and corrective action taken to repair the pipe. The fact that the leak was discovered by a plant walkdown and repaired in a timely manner provides evidence that the aging management techniques employed by the External Surfaces Monitoring Program will be effective.

The BVPS LRA states that, *"Industry and plant-specific operating experience will be evaluated in the development and implementation of this program. As additional operating experience is obtained, lessons learned will be appropriately incorporated into the program."*

#### **B.2.22—Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components**

Visual inspection techniques are well proven in the industry and have been demonstrated as an effective means for detecting degradation.

Corrosion of internal surfaces has been reported in the course of performing surveillance tests, preventive maintenance programs, and system maintenance. When found, corrosion of internal surfaces was documented, dispositioned, corrected (as applicable), and trended using the FENOC Corrective Action Program.

For example, in 2006, during removal of a hot water heating sample heat exchanger and associated piping it was noted that the outlet piping was restricted with rust and corrosion. A condition report was written, and the heat exchanger was disassembled and removed for further inspection. The tube side piping was disassembled, rodded, and flushed. The accessible portion of the shell side was rodded and flushed.

As another example, in 2006, a river water ball valve was disassembled to allow cleaning and inspection of the inner diameter of the 6" pipe to valve welds to look for evidence of possible microbiologically induced corrosion (MIC). A 3/32" diameter open pit was found on the outlet/downstream valve end piece to pipe weld, on the valve end piece, approximately 1/8" from the toe of the weld. A condition report was written. There was no evidence that an external leak had

occurred. The weld was repaired. As result of the finding, an Engineering Evaluation for an Engineering Change was requested to replace on an as-needed basis the existing 300 series ball valves at Unit 1 with AL6XN material, which is more resistant to MIC.

The BVPS LRA states that, "*Industry and plant-specific operating experience will be evaluated in the development of this program,*" and, "*Future operating experience will be appropriately incorporated into the program.*" These statements differ slightly from the similar statements in other new aging management programs. Therefore, the BVPS LRA is revised to make these operating experience statements consistent with the corresponding statements in the other new aging management programs.

See the Enclosure to this letter for the revision to the BVPS LRA.

#### **B.2.26—Metal Enclosed Bus (Unit 2 only)**

For aging management, this program will visually inspect internal surfaces for aging degradation of insulating and conductive components. A sample of accessible bolted connections will be checked for loose connections using thermography.

During a 2003 4kV bus inspection on a Unit 1 metal enclosed bus of similar design and materials but not in-scope for license renewal, several insulator bolts were found to be loose and one was found to be missing in a bus cubicle. This degraded condition was entered into the FENOC Corrective Action Program. The loosened bolts were re-torqued to vendor recommended values and the missing bolt was addressed by an Engineering evaluation. Due to the findings of this inspection, an unplanned inspection of an additional cubicle was performed, and no problems were found.

The BVPS LRA states that, "*Industry and plant-specific operating experience will be evaluated in the development and implementation of this program. As additional operating experience is obtained, lessons learned will be appropriately incorporated into the program.*"

#### **B.2.30—One-Time Inspection**

The One-Time Inspection Program will require one-time inspections to verify effectiveness of the Water Chemistry Program [Section B.2.42], the Fuel Oil Chemistry Program [Section B.2.20], and the Lubricating Oil Analysis Program [Section B.2.24].

The Water Chemistry Program is an existing sampling and analysis program. Conformance to procedural requirements and industry guidelines, and sensitivity to operating experience reports provide reasonable assurance that the Water

Chemistry Program will effectively manage loss of material, cracking, and reduction of heat transfer for in-scope components during the period of extended operation.

The Fuel Oil Chemistry Program is an existing program that utilizes sampling and analysis to ensure that adequate diesel fuel quality is maintained to prevent loss of material and fouling in the various in-scope fuel oil systems. Exposure of fuel oil to contaminants such as water and particulates is also minimized by periodic draining of accumulated water, tank interior cleaning, and by verifying the quality of new oil before its introduction into the storage tanks.

The BVPS Lubricating Oil Analysis Program has been effective at managing aging effects by periodically sampling and analyzing lubricating oil from these inscope components.

Search of recent BVPS plant-specific operating experience did not identify any significant aging related degradation associated with the components that will be managed by the One-Time Inspection Program and the Water Chemistry Program, the Fuel Oil Chemistry Program, or the Lubricating Oil Analysis Program. The one-time inspections will provide additional assurance that aging is not occurring, or aging is so insignificant that an aging management program is not warranted.

The BVPS LRA states that, *"Industry and plant-specific operating experience will be evaluated in the development and implementation of this program. As additional operating experience is obtained, lessons learned will be appropriately incorporated into the program."*

#### **B.2.36—Selective Leaching of Materials**

The Selective Leaching of Materials Program includes a one-time visual inspection and hardness examination of selected components that are susceptible to selective leaching.

Loss of material due to selective leaching has been reported in susceptible components at BVPS. When found, it was documented, dispositioned, corrected (as applicable), and trended using the FENOC Corrective Action Program.

For example, in 2001, after a fire pump auto-started, water was reported to be coming from the ground due to a fire water piping failure. A condition report was written. A sample of the pipe material was sent to a laboratory for analysis. The failure analysis report indicated that the pipe material suffered from graphitic corrosion attributed to breaching of the installed bituminous coating on the exterior of the pipe. The iron had leached out of the gray cast iron, leaving mainly graphite, which was not capable of supporting the load on the pipe.

Corrective actions included the replacement of the pipe with another material which was not susceptible to graphitic corrosion.

The BVPS LRA states that, "*Industry and plant-specific operating experience will be evaluated in the development and implementation of this program. As additional operating experience is obtained, lessons learned will be appropriately incorporated into the program.*"

#### **B.2.41—Thermal Aging Embrittlement of Cast Austenitic Stainless Steel (CASS)**

For potentially susceptible materials that are part of the reactor coolant pressure boundary, this program will consist of either volumetric examination of the base metal or a component-specific flaw tolerance evaluation. Potentially susceptible components that are not part of the reactor coolant pressure boundary will be inspected, evaluated, or replaced as appropriate. BVPS will determine required inspections on a case by case basis.

To date, there has been no BVPS plant-specific operating experience regarding degradation of austenitic stainless steel castings due to thermal aging. The Aging Management Program described in NUREG-1801, Section XI.M12 was developed by using research data obtained on both laboratory-aged and service-aged materials.

The BVPS LRA states that, "*Industry and plant-specific operating experience will be evaluated in the development and implementation of this program. As additional operating experience is obtained, lessons learned will be appropriately incorporated into the program.*"

#### **Part 2 – As stated in SRP-LR, Appendix A.1.2.3.10.2, please include a commitment to provide operating experience in the future for new programs to confirm their effectiveness:**

The existing license renewal future commitment for each new aging management program made by FENOC in the BVPS LRA, Appendix A, Table A.4-1 (Unit 1) and Table A.5-1 (Unit 2), as applicable, meets the intent of the recommendation of NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants," Appendix A, Section A.1.2.3.10.2. For each new program credited by FENOC for aging management during the period of extended operation, a license renewal future commitment is included to implement the program prior to the period of extended operation "as described in" the corresponding section of Appendix B. The Appendix B Operating Experience element for each new program includes a statement that industry and plant-specific operating experience will be incorporated into the

program. Therefore, a license renewal commitment to consider and incorporate feedback from operating experience into new aging management programs is included by reference in the LRA, Appendix A, Tables A.4-1 (Unit 1) and Table A.5-1 (Unit 2).

In addition, the FENOC Corrective Action Program is relied upon to document operating experience that indicates a lack of program effectiveness and initiate corrective actions such that recurrence of significant conditions is prevented. These Corrective Action Program activities are applicable to all programs following implementation.

However, to confirm the effectiveness of the new license renewal aging management programs based on the incorporation of operating experience, the BVPS LRA is revised to include a new license renewal future commitment to perform a program self-assessment of all new license renewal aging management programs, to be completed five (5) years after entering the period of extended operation.

See the Enclosure to this letter for the revision to the BVPS LRA.

## ENCLOSURE

Beaver Valley Power Station (BVPS), Unit Nos. 1 and 2

Letter L-08-226

**Amendment No. 21 to the  
BVPS License Renewal Application**

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**License Renewal Application  
Sections Affected**

Table A.4-1

Table A.5-1

Section B.2.8

Section B.2.10

Section B.2.22

The Enclosure identifies the correction by Affected License Renewal Application (LRA) Section, LRA Page No., and Affected Paragraph and Sentence. The count for the affected paragraph, sentence, bullet, etc. starts at the beginning of the affected Section or at the top of the affected page, as appropriate. Below each section the reason for the change is identified, and the sentence affected is printed in *italics* with deleted text ~~lined-out~~ and added text underlined.

**Affected LRA Section**      **LRA Page No.**      **Affected Paragraph and Sentence**

**Table A.4-1**                      **Page A.4-9**                      **New Item Number 29**

LRA Table A.4-1, "Unit 1 License Renewal Commitments," requires a new License Renewal Future Commitment related to new aging management programs. FENOC plans to confirm the effectiveness of the new license renewal aging management programs based on the incorporation of operating experience by performing a program self assessment of all new license renewal aging management programs. New Item Number 29 is created, and LRA Table A.4-1 is revised to read:

<b>Item No.</b>	<b>Commitment</b>	<b>Implementation Schedule</b>	<b>Source</b>	<b>Related LRA Section No./ Comments</b>
29	<u>Confirm the effectiveness of the new license renewal aging management programs based on the incorporation of operating experience by performing a program self assessment of all new license renewal aging management programs. [See NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants," Appendix A, "Branch Technical Positions," Section A.1.2.3.10, Items 1 and 2.]</u>	<u>January 29, 2021</u>	<u>FENOC Letter L-08-226</u>	<u>B.2.8</u> <u>B.2.10</u> <u>B.2.11</u> <u>B.2.12</u> <u>B.2.15</u> <u>B.2.21</u> <u>B.2.22</u> <u>B.2.30</u> <u>B.2.31</u> <u>B.2.36</u> <u>B.2.41</u>

**Affected LRA Section**      **LRA Page No.**      **Affected Paragraph and Sentence**

**Table A.5-1**                      **Page A.5-10**                      **New Item Number 28**

LRA Table A.5-1, "Unit 2 License Renewal Commitments," requires a new License Renewal Future Commitment related to new aging management programs. FENOC plans to confirm the effectiveness of the new license renewal aging management programs based on the incorporation of operating experience by performing a program self assessment of all new license renewal aging management programs. New Item Number 28 is created, and LRA Table A.5-1 is revised to read:

<b>Item No.</b>	<b>Commitment</b>	<b>Implementation Schedule</b>	<b>Source</b>	<b>Related LRA Section No./ Comments</b>
28	<u>Confirm the effectiveness of the new license renewal aging management programs based on the incorporation of operating experience by performing a program self assessment of all new license renewal aging management programs. [See NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants," Appendix A, "Branch Technical Positions," Section A.1.2.3.10, Items 1 and 2.]</u>	<u>May 27, 2032</u>	<u>FENOC Letter L-08-226</u>	<u>B.2.8</u> <u>B.2.10</u> <u>B.2.11</u> <u>B.2.12</u> <u>B.2.13</u> <u>B.2.15</u> <u>B.2.21</u> <u>B.2.22</u> <u>B.2.26</u> <u>B.2.30</u> <u>B.2.31</u> <u>B.2.36</u> <u>B.2.41</u>

<u>Affected LRA Section</u>	<u>LRA Page No.</u>	<u>Affected Paragraph and Sentence</u>
Section B.2.8	Page B.2-22	Operating Experience, New Paragraph

LRA Section B.2.8, "Buried Piping and Tanks Inspection," under the Subheading "Aging Management Program Elements—Operating Experience," a new paragraph is added at the end of the subsection to include an operating experience incorporation statement consistent with the corresponding statement in the other new aging management programs. LRA Section B.2.8, subsection "Operating Experience," is revised to include a new paragraph at the end of the section, which reads:

"Industry and plant-specific operating experience will be evaluated in the development and implementation of this program. As additional operating experience is obtained, lessons learned will be appropriately incorporated into the program."

Section B.2.10	Page B.2-28	Operating Experience 2 <sup>nd</sup> Paragraph, 2 <sup>nd</sup> Sentence
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LRA Section B.2.10, "Electrical Cable Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements One-Time Inspection," under the Subheading "Aging Management Program Elements—Operating Experience," states that, "Industry and plant-specific operating experience will be evaluated in the development and implementation of this program. Future operating experience will be appropriately incorporated into the program." This second sentence differs slightly from the similar statement in other new aging management programs. Therefore, the BVPS LRA is revised to make this operating experience statement consistent with the corresponding statement in the other new aging management programs. LRA Section B.2.10, subsection "Operating Experience," 2<sup>nd</sup> paragraph, 2<sup>nd</sup> sentence, is revised to read:

"Industry and plant-specific operating experience will be evaluated in the development and implementation of this program. As additional operating experience is obtained, lessons learned will be appropriately incorporated into the program. ~~Future operating experience will be appropriately incorporated into the program.~~"

<u>Affected LRA Section</u>	<u>LRA Page No.</u>	<u>Affected Paragraph and Sentence</u>
Section B.2.22	Page B.2-64	Operating Experience 1 <sup>st</sup> Paragraph, 2 <sup>nd</sup> Sentence, and 4 <sup>th</sup> Paragraph, Last Sentence

LRA Section B.2.22, "Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components," under the Subheading "Aging Management Program Elements—Operating Experience, requires revision to make the operating experience incorporation statements consistent with the corresponding statements in the other new aging management programs. LRA Section B.2.22, subsection "Operating Experience," 1<sup>st</sup> paragraph, 2<sup>nd</sup> sentence, and 4<sup>th</sup> paragraph, last sentence, are deleted, and a new paragraph is added following the 4<sup>th</sup> paragraph in the subsection. LRA Section B.2.22, subsection "Operating Experience," is revised to read:

***"Operating Experience***

The Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components Program is a new program for which there is no operating experience for program effectiveness. ~~Industry and plant specific operating experience will be evaluated in the development of this program.~~ Industry operating experience that forms the basis for the program is described in the operating experience element of the NUREG-1801, Section XI.M38 program description. BVPS plant-specific operating experience is consistent with the operating experience in the program description.

Inspection of internal surfaces during the performance of periodic surveillances and maintenance activities has been in effect at BVPS in support of plant component reliability programs.

For example, a 1999 internal inspection of a tank visually indicated that the protective coating was not degraded. However, rust scale was found on the bottom of the tank and was determined to have originated from carbon steel piping between the compressor and the tank. An engineering examination and evaluation was conducted on the piping to determine its condition. The piping was found to be within acceptable design margins for continued operation.

These inspection and follow-up engineering evaluation activities have proven effective in maintaining the material condition of plant systems, structures, and components, including the internal surfaces of piping and ducting components. ~~Future operating experience will be appropriately incorporated into the program.~~

Industry and plant-specific operating experience will be evaluated in the development and implementation of this program. As additional operating experience is obtained, lessons learned will be appropriately incorporated into the program.

Incorporation of operating experiences provides reasonable assurance that the Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components program will manage the aging effects of such components through the period of extended operation.”