FENOC
FirstEnergy Nuclear Operating Company

Beaver Valley Power Station
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October 10, 2008
L-08-324

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
Supplemental Information for the Review of the Beaver Valley Power Station, Units 1 and 2, License Renewal Application (TAC Nos. MD6593 and MD6594)

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 license renewal integrated plant assessment in Section B.2.6 of the BVPS LRA. Reference 3 provided the FENOC reply to Reference 2.

During a conference call on September 26, 2008 between FENOC and the U. S. Nuclear Regulatory Commission (NRC), the NRC requested additional justification for a reviewer-identified difference in the BVPS LRA, Section B.2.6. The Attachment provides supplemental information to FENOC's response to RAI B.2.6-2 (see Reference 3) for review.

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 October 10th, 2008.

Sincerely,

Peter P. Sena III

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NRR

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)," March 26, 2008.
3. FENOC Letter L-08-144, "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)," April 25, 2008.

Attachment:

Supplemental Information Regarding Beaver Valley Power Station, Units 1 and 2, License Renewal Application, Section B.2.6

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

cc: w/o Attachment
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-08-324

Supplemental Information Regarding
Beaver Valley Power Station, Units 1 and 2,
License Renewal Application,
Section B.2.6

Section B.2.6

In a teleconference on Friday, September 26, 2008 between the NRC staff and FENOC License Renewal Staff, the NRC requested more detail regarding how FENOC manages identified leaks in non-ASME bolted connections. FENOC agreed to send additional justification for the reviewer-identified difference in RAI B.2.6-2.

SUPPLEMENTAL RESPONSE RAI B.2.6-2

In order to provide additional justification for the reviewer-identified difference in RAI B.2.6-2, the following information is submitted regarding management of bolted connections at Beaver Valley Power Station (BVPS).

BVPS has no specific written guidance that requires daily monitoring of identified leaks in non-ASME bolted connections. However, leaks that are "conditions adverse to quality" (i.e, that could result in a challenge to a system or component function) are entered into the FENOC Corrective Action Program. The FENOC Corrective Action Program is relied upon to ensure evaluations are performed and appropriate corrective actions are applied. Depending on the magnitude and significance of the leak, corrective actions may include periodic monitoring and trending of leakage.

Leaks that do not constitute a condition adverse to quality are documented in the SAP database, entered into the Work Management Process, and are monitored and tracked by the BVPS Leak Elimination Program. Operators performing daily rounds, Maintenance personnel in the plant, System Engineers performing walkdowns, and other personnel passing through accessible plant areas provide additional resources to identify leaks that could result in a challenge to system or component intended functions.

The BVPS Work Management Process is used to prioritize site work, including repair of leaks. BVPS characterizes work in accordance with Institute for Nuclear Power Operations (INPO) document INPO AP-928, "Work Management Process Description." The prioritization of leak repairs is based on work classification, system significance, and operational significance.

Based on the above, leaks that do not constitute a condition adverse to quality may not be monitored as frequently as daily, weekly, or biweekly. However, the monitoring and trending performed by the BVPS Leak Elimination Program provides adequate monitoring of these types of leaks to ensure that system or component functions are not challenged.