

June 8, 2009

MEMORANDUM TO: File

FROM: Kent Howard, Project Manager /RA/
Projects Branch 2
Division of License Renewal
Office of Nuclear Reactor Regulation

SUBJECT: DOCKETING OF NRC TELECONFERENCE NOTES PERTAINING TO
THE LICENSE RENEWAL OF THE BEAVER VALLEY POWER
STATION, UNITS 1 AND 2

This Memorandum makes the following enclosed correspondence publicly available:

- **NRC License Renewal Teleconference – June 4, 2009**

Enclosure:
As stated

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DATE	06/08/09	06/08/09

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Memorandum File, from K. Howard dated, June 08, 2009

SUBJECT: DOCKETING OF NRC TELECONFERENCE NOTES PERTAINING TO THE
LICENSE RENEWAL OF THE BEAVER VALLEY POWER STATION, UNITS 1
AND 2

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RidsNrrDlrRpb1 Resource

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RidsNrrDlrRerb Resource

RidsNrrDlrRpob Resource

RidsNrrDciCvib Resource

RidsNrrDciCpnb Resource

RidsNrrDciCsgb Resource

RidsNrrDraAfpb Resource

RidsNrrDraApla Resource

RidsNrrDeEmcb Resource

RidsNrrDeEeeb Resource

RidsNrrDssSrxb Resource

RidsNrrDssSbpb Resource

RidsNrrDssScvb Resource

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Conference Call – Discussion of Liner Corrosion RAI Responses

Thursday, June 4, 2009

1:00pm

Participants

FENOC

Cliff Custer
Jack Patterson
Jim Hester

Mark Manoleras
Dave Grabski
Levi Stahl

Carmen Mancuso
John Thomas
Glenn Ritz

NRC

Kent Howard
Dan Hoang
Paul Kaufman
James Gavula

Dave Wrona
Hansraj Ashar
Bryce Lehman
Meena Khanna

John Richmond
Zuhan Xi
Abdul Sheikh

Discussion

NRC (KH) We have some preliminary questions before we get the questions we sent.
NRC (HA) Regarding B.23-4, does FENOC take credit for coatings for license renewal?
FENOC (CC) No, we do not.
NRC (HA) Is the 100% visual inspection credited for IWE?
FENOC (CC) Yes.
NRC (HA) Regarding your enhancements to the IWE program, my understanding is that coatings will only be removed if required.
FENOC (DG) That logic is correct. The first thing we do is a 100% visual inspection, any suspect locations are identified, at that point a qualified VT inspector will evaluate.
NRC (HA) For the visual examination, why VT-3 and not VT-1?
FENOC (DG) VT-3 inspection gets what we need to accomplish and we do it before removing paint.
NRC (HA) You have calibrated the VT-3 examination in such a way that you can identify coating defects?
FENOC (DG) Yes
NRC (HA) If a defect is found you remove coatings revealing the liner plate, then what?
FENOC (DG) If there is an indication of damage we would do either volumetric or surface examination based on our evaluation.
NRC (HA) Regarding the wood that was found, was any evaluation of environment caused by wood performed? (e.g., O₂ or contaminants? or acidic?)
FENOC (CM) Root cause not complete. We believe the primary cause was the wood, the moisture in the wood and O₂.
NRC (HA) Analysis?..... alkaline or acidic?
FENOC (CM) Acidic – pH was measured but cannot be stated here.
NRC (KH) Can we get a copy of the root cause report when it is approved?
FENOC (MM) Yes, via the NRC resident.
NRC (HA) It appears that the standard construction procedure had pieces of wood put in with the reinforcing bars. Are there other locations and are those locations known?

ENCLOSURE

FENOC (CC) Wood used as a temporary measure to facilitate the concrete pour. The quality procedures did direct for the wood to be removed. Any other possible locations are unknowable. NRC (HA) No further questions.

NRC (KH) Let us proceed to the questions we sent in the email.
Question #1 (The 75 locations for selection are under evaluation by the IWE coordinator. Because of this emergent issue, at this point in time, there is no evidence to support that any one area may/may not be more susceptible...the locations will be chosen by the IWE coordinator with the intent that they are random locations identified after the evaluation to define those locations with higher probability are determined.) What areas are inaccessible?

FENOC (CC) Still under review.

FENOC (DG) 75 areas – We are going to focus on similar elevations, focus on any repainting since construction. We are going use smart selection, not completely random.

NRC (KH) What areas are considered inaccessible?

FENOC (DG) Code defined – after construction additions (e.g., elevators, floors are part of construction).

NRC We acknowledge – you will follow the definition in the code.

NRC (HA) If you found something occurring in an inaccessible area, would you investigate that further?

FENOC (DG) Absolutely. Required by the code. (e.g., moisture barrier, if we found corrosion we would have to get down there and investigate)

FENOC (CC) This would be done iaw our Corrective Action Program, and extent of condition analyses.

NRC (KH) Question #2 (The steps to be taken if degradation is identified are stated in the response to RAI B.2.3-4.)

FENOC (CC) See our response to B.2.3-4, parts 1 and 2, keeping in mind this would be done via the Corrective Action Program and extent of condition analysis.

NRC (HA) Will you increase the number of locations?

FENOC (DG) We will evaluate for extent of condition.

FENOC (CC) Several options, depending on our findings.

NRC (HA) Suppose the findings are the same as the defect found in 2009? Will you expand the sample size?

FENOC (MM) Not necessarily. We will reevaluate.

NRC (HA) If you are trying to establish 95/95 assurance. If you find degradation don't you have to increase your sample size?

FENOC (MM) It could include that.

NRC (DW) The EPRI report that you cite, is that a statistical analysis methodology?

FENOC (JT) EPRI study done for Calvert Cliffs, for sampling in the One Time Inspection program. It is a statistical method.

NRC (DW) Ok. If you find a problem you would put it into your Corrective Action Program, and that might lead you to expanding the sample size.

FENOC (CC) That is correct.

NRC (KH) Question #3 (The implementation timeframe is as listed in Appendix A of the application with the new LRA Amendment. As this commitment is for

	License Renewal under 10CFR54 guidance, the timeframe for completion is prior to entering the PEO.)
FENOC (CC)	Our response is in terms of Part 54. We commit to "prior to the period of extended operation." We do not want to (and cannot) get into making Part 50 commitments. We are going to evaluate the schedule.
NRC (HA)	Condition is existing right now. I understand your distinction between Part 50 and Part 54. How much prior to the period of extended operation?
FENOC (MM)	Our response is in terms of Part 54. Any other evaluations or actions are part of our Corrective Action Program.
NRC (KH)	We have discussed this. We are happy with the response but we are going to add a statement to the SER that this is being looked at in Part 50 space, but for the purposes of license renewal PEO is adequate.
NRC (KH)	Question #4 (When are your next scheduled ILRT tests for each unit? Have you considered performing an earlier ILRT in order to demonstrate the leak tightness of the containment liners?)
FENOC (JP)	Unit 1 – 1R23 – Spring of 2015 Unit 2 – 2R19 – Spring of 2017
NRC (KH)	Are you going to move up your ILRT inspections?
FENOC (MM)	No. We have determined that our current schedule is adequate.
NRC (HA)	When were the last ILRT's done?
FENOC (JP)	Unit 1 – May 2006, Unit 2 – May 2008
NRC (KH)	Question #5 (Why are the volumetric examinations not being performed in upcoming outages? What is the rationale behind waiting until 2016 and 2027?)
NRC	This was discussed / answered in Question #3. No further questions.
NRC (KH)	It is my understanding that nothing is owed to us. We can complete the SER with what we have.
NRC (JR)	What is the basis for the 75 one square foot samples?
FENOC (JT)	1 square foot sample size discussed in IWE. Methodology used the EPRI report, based on total area of liner. 75 is the limit regardless of total population (asymptotic).
NRC (HA)	Regarding the rebar (discussed in RAI B.2.5-1), what did you find?
FENOC (CM)	The rebar was non-structural. It was left in place, the concrete was intact, dispositioned via the Corrective Action Program.
NRC (HA)	Was it pressure grout or hand-packed?
FENOC (CM)	Hand-packed. We cleaned the rebar, hand-packed the grout, then replaced the liner plate. The grout was replaced in accordance plant installation standards.
NRC (HA)	Was any epoxy used with the grout?
FENOC (CC)	We will follow-up with the necessary information regarding whether epoxy was used in an email.
NRC (KH)	Ok.
NRC (HA)	What was the size of the rebar?
FENOC (CC)	We will include that in the email. We believe it was #8 or #9 rebar.
NRC (KH)	Can we have a copy of your notes (call summary) and if so, when?
FEROC (CC)	Today.

End of Call

Action items – two emails from FENOC to the NRC:
whether epoxy was used in the grout, and
a copy of the call summary (this document).