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Fax: 724-643-8069September 4, 2009
L-09-243

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), and License Renewal Application Amendment No. 41

Reference 1 provided the FirstEnergy Nuclear Operating Company (FENOC) License Renewal Application (LRA) for the Beaver Valley Power Station (BVPS). Reference 2 provided Amendment No. 40 to Reference 1. This letter clarifies and expands information provided in Reference 2 as discussed in a September 3, 2009 telephone conference call between FENOC and the U. S. Nuclear Regulatory Commission (NRC).

The Attachment provides the clarification and expanded information. The Enclosure provides Amendment 41 to the BVPS LRA.

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 September 4, 2009.

Sincerely,



Peter P. Sena III

A108
NRR

References:

1. FENOC Letter L-07-113, "License Renewal Application," August 27, 2007.
2. FENOC Letter L-09-242, "Supplemental 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. 40," September 2, 2009.

Attachment:

Supplemental Information Regarding Beaver Valley Power Station, Units 1 and 2, License Renewal Application, Section B.2.3

Enclosure:

Amendment No. 41 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-09-243

Supplemental Information Regarding
Beaver Valley Power Station, Units 1 and 2,
License Renewal Application,
Section B.2.3

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Responses to Questions No. 1 and No. 2 (in FENOC Letter L-09-242) are replaced, in their entirety, with the following:

1. Describe the failure criteria for volumetric (UT) examination which will trigger the UT scanning at additional locations. In establishing the criteria, distinguish between the criteria used; (1) if the metal thinning is attributed to degradation on the inside surface of the liner, and (2) if the metal thinning is attributable to the exterior surface (in contact with the containment concrete) of the liner.

Metal thinning attributed to degradation on the inside surface of the liner will be managed in accordance with the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Section XI, Subsection IWE Program. The statistical sampling program is not applicable to degradation of the inside surface of the liner.

Industry and site specific operating experience (OE) has demonstrated that pitting corrosion degradation due to foreign material manifests itself with pits that have measurable breadth and shape. FENOC characterizes a statistical failure at the concrete to liner interface as a random location with greater than 10% loss of material, displaying measurable breadth and shape; unless through engineering evaluation it is determined that indications are attributed to fabrication/erection practices or locations not indicative of corrosion. If a statistical failure is identified, it will be placed into the corrective action program and evaluated in accordance with 10 CFR 50, Appendix B, Criterion XVI. The random sample plan will assure a confidence level of 95% that 95% of the accessible ultrasonically untested containment liner is not experiencing localized pitting corrosion degradation of concern. Statistical failures will be re-examined during subsequent outages until dispositioned. Locations with identified loss of material less than 10% but with a breadth and shape will be entered into the corrective action program and tracked as a point of interest for monitoring during subsequent outages until dispositioned.

Unit 1 inspections for the initial sample lot of a minimum of 75 random samples will be completed in the next three refueling outages, beginning with the next Unit 1 refueling outage in 2010. The entire sample plan will be completed by January 29, 2016. Results will be available for on-site review and included in the summary report letter as described in Question 3.

2. Describe how you intend to statistically analyze the results of the UT examinations of the random and non-random samples (e.g., Kriging analysis or similar method) to determine the general state of the liner. Provide justification that your approach will adequately characterize the general state of the liner.

The purpose of the random sampling plan is to make valid characterizations about the general state of the containment liner. The random sampling plan includes 100% UT of a minimum of 75 1-ft x 1-ft square areas randomly selected on the accessible ultrasonically untested portion of the containment liner per unit. The completion of the random sample plan, with a minimum of 75 samples, will provide a confidence level of 95% that 95% of the accessible ultrasonically untested liner is not experiencing localized pitting corrosion of concern with greater than 10% loss of material.

FENOC will evaluate if an appropriate/applicable statistical method exists to gain additional insight into potential liner degradation. Data gathered will be evaluated and used to determine the general state of the liner.

During the course of data collection, FENOC will evaluate the data for wall thinning or corrosion that may potentially challenge the capability of the liner to perform its intended function. These conditions will be entered into the corrective action program for evaluation and disposition.

ENCLOSURE

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

Letter L-09-243

Amendment No. 41 to the
BVPS License Renewal Application
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License Renewal Application
Sections Affected

Table A.4-1

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** **Item No. 32**

Commitment No. 32 in LRA Table A.4-1, "Unit 1 License Renewal Commitments," is revised as follows:

Item Number	Commitment	Implementation Schedule	Source	Related LRA Section No./ Comments
32	<p><i>Supplemental volumetric examinations will be performed on the Unit 1 containment liner prior to the period of extended operation. SA <u>minimum of seventy-five (one foot square) randomly selected (as described in FENOC Letter L-09-205) sample locations will be examined (as described in FENOC Letter L-09-242243). If degradation is identified, it will be addressed through the corrective action program (as described in FENOC Letter L-09-243).</u></i></p>	<p><i>Unit 1 inspections for the initial sample lot of <u>a minimum of 75 random ultrasonic examinations will be completed in the next three refueling outages, beginning with the Unit 1 refueling outage in 2010. Examinations The random sample plan will be completed by January 29, 2016</u></i></p>	<p>FENOC Letter L-09-205, <u>and</u> FENOC Letter L-09-242 <u>and</u> <u>FENOC Letter L-09-243</u></p>	None