



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

June 15, 2011

Mr. Paul A. Harden  
Site Vice President  
FirstEnergy Nuclear Operating Company  
Beaver Valley Power Station  
Mail Stop A-BV-SEB1  
P.O. Box 4, Route 168  
Shippingport, PA 15077

**SUBJECT: BEAVER VALLEY POWER STATION, UNIT NOS. 1 AND 2 - CLOSEOUT OF  
GENERIC LETTER 2008-01 "MANAGING GAS ACCUMULATION IN  
EMERGENCY CORE COOLING, DECAY HEAT REMOVAL, AND  
CONTAINMENT SPRAY SYSTEMS" (TAC NOS. MD7795 AND MD7796)**

Dear Mr. Harden:

By letter dated January 11, 2008 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML072910759), the Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems." The stated purpose of GL 2008-01 was (a) to request addressees to submit information to demonstrate that the subject systems are in compliance with the current licensing and design bases and applicable regulatory requirements, and that suitable design, operational, and testing control measures are in place for maintaining this compliance; and, (b) to collect the requested information to determine if additional regulatory action is required.

GL 2008-01 requested that licensees provide the following information within 9 months of the date of the GL:

- (a) A description of the results of evaluations that were performed pursuant to requested actions specified in the GL. This description should provide sufficient information to demonstrate that you are or will be in compliance with the quality assurance criteria in Sections III, V, XI, XVI, and XVII of Appendix B to 10 CFR Part 50 and the licensing basis and operating license as those requirements apply to the subject systems;
- (b) A description of all corrective actions, including plant, programmatic, procedure, and licensing basis modifications that you determined were necessary to assure compliance with these regulations; and,
- (c) A statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.

In item (c), licensees typically had to wait for a refueling outage to access parts of the plant that were inaccessible at power. Consequently, licensees provided or plan to provide supplementary responses following the outage. Where available, the Nuclear Reactor Regulation (NRR) staff has reviewed the supplementary response, and the Region I staff should address responses that have not been included in the NRR staff review.

By letters dated October 14, 2008 (ADAMS Accession No. ML082900492), August 18, 2009 (ADAMS Accession No. ML092360404), and January 29, 2010 (ADAMS Accession No. ML100340401), FirstEnergy Nuclear Operating Company (the licensee) provided information in response to the GL for Beaver Valley Power Station, Unit Nos. 1 and 2 (BVPS-1 and 2). The NRC staff has reviewed the licensee's responses and has documented the evaluation in "Suggestions for the Beaver Valley Power Station Inspection Using the Guidance Provided in Temporary Instruction 2515/177." The NRC staff has reviewed the submitted information for BVPS-1 and 2, and has determined that the licensee's responses are acceptable.

The following five request for additional information (RAI) questions were presented to the licensee for BVPS-1 and 2:

- RAI 1 asked the licensee to clarify the schedule for evaluating the Technical Specification Task Force traveler and if necessary, the schedule for submitting a license amendment. The NRC staff reviewed the response and finds it acceptable.
- RAI 2 asked the licensee to discuss how often at least two check valves are leak tested and what actions would occur if the valves were found to be leaking. The licensee responded that the check valves are tested every refueling outage and if established leakage acceptance criteria are exceeded, programs require that the valves be repaired or replaced and then retested. The licensee also stated that any leakage through the check valves would not create an unacceptable void volume. The NRC staff reviewed the response and finds it acceptable.
- RAI 3 asked the licensee to discuss the monitoring of the emergency core cooling, decay heat removal, and containment spray systems for evidence of gas voids. The licensee discussed the monitoring of gas voids in these systems in the 9-month response to the generic letter. The NRC staff reviewed the response and finds it acceptable.
- RAI 4 asked the licensee to clarify the meaning of "accessible" and "inaccessible." The licensee clarified the meanings and situations; therefore, the NRC staff finds the response acceptable.
- RAI 5 asked the licensee to provide a brief description of training applied to GL 2008-01. The NRC staff reviewed the response and finds it acceptable.

BVPS-1 and 2's Void Monitoring procedure is performed on a monthly basis with allowance for adjustment of test frequency by the system engineer. The licensee uses the corrective action program (CAP), and as well as, the Void Monitoring procedure to manage gas accumulation. NRC staff finds that the licensee is effectively using their CAP processes and has demonstrated that these systems are currently operable.

P. Harden

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The NRC staff has concluded that the licensee has acceptably demonstrated "that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified," as stated in GL 2008-01. The NRC staff is continuing to engage with stakeholders regarding the creation of durable guidance for Gas Management, which may require additional actions by the licensee beyond the scope of Generic Letter 2008-01.

If you have any questions regarding this issue, contact me at (301) 415-1016.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nadiyah Morgan', with a long horizontal flourish extending to the right.

Nadiyah Morgan, Project Manager  
Plant Licensing Branch I-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-334 and 50-412

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*/ra/*

Nadiyah Morgan, Project Manager  
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\*See memo dated 5/9/2011

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