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August 30, 2010
L-10-249

10 CFR 50.55a

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
Proposed 10 CFR 50.55a Requests (VRR2) Associated with American Society of Mechanical Engineers (ASME) Operations and Maintenance (OM) Code Case OMN-12

In accordance with 10 CFR 50.55a, FirstEnergy Nuclear Operating Company (FENOC) requests Nuclear Regulatory Commission (NRC) approval of proposed alternatives for the Beaver Valley Power Station (BVPS) Unit No.1 fourth interval Inservice Testing Program for Pumps and Valves (IST Program) and the BVPS Unit No. 2 third interval IST Program.

Position verification testing of certain air-operated valve assemblies included in the BVPS, Unit Nos. 1 and 2 IST Programs is currently performed in accordance with the frequency described in Paragraph ISTC-3700 of the ASME OM Code-2001 Edition, "Code for Operation and Maintenance of Nuclear Power Plants," with Addenda through OMb-2003. Enclosed is the proposed alternative to perform position verification testing of these air operated valve assemblies at the diagnostic test frequency described in ASME Code Case OMN-12, "Alternate Requirements for Inservice Testing Using Risk Insights for Pneumatically-and Hydraulically-Operated Valve Assemblies in Light-Water Reactor Power Plants (OM-Code 1998, Subsection ISTC)," for BVPS, Unit Nos. 1 and 2.

In support of the spring 2012 refueling outage, FENOC requests approval of the proposed requests by September 2011.

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NRR

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Thomas A. Lentz, Manager – Fleet Licensing, at 330-761-6071.

Sincerely,

Paul A. Harden

Enclosure:

Valve Relief Request 2, Proposed Alternative in Accordance with 10CFR50.55a(a)(3)(i)

cc: NRC Region I Administrator
NRC Senior Resident Inspector
NRC Project Manager
Director BRP/DEP
Site BRP/DEP Representative

10CFR 50.55a Request Number: VRR2

Proposed Alternative
in Accordance with 10 CFR 50.55a(a)(3)(i)

--Alternative Provides Acceptable Level of Quality and Safety--

1.0 ASME Code Components Affected

Air-operated valve assemblies included in the Beaver Valley Power Station (BVPS), Unit Nos. 1 and 2 Inservice Testing (IST) Programs for Pumps and Valves that are tested in accordance with ASME OM Code Case OMN-12, "Alternate Requirements for Inservice Testing Using Risk Insights for Pneumatically-and Hydraulically-Operated Valve Assemblies in Light-Water Reactor Power Plants (OM-Code 1998, Subsection ISTC)."

2.0 Applicable Code Edition and Addenda

American Society of Mechanical Engineers (ASME) Operations and Maintenance (OM) Code-2001, with Addenda through OMb-2003

3.0 Applicable Code Requirement

ISTC-3700, "Position Indication Verification," states in part, "Valves with remote position indicators shall be observed locally at least once every 2 years to verify that valve position is accurately indicated."

4.0 Reason for Request

NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants," Revision 1, Section 4.2.5, "Alternatives to Stroke-Time Testing," states in part, "As an alternative to [Air Operated Valve] AOV stroke-time testing, ASME developed Code Case OMN-12, 'Alternative Requirements for Inservice Testing Using Risk Insights for Pneumatically- and Hydraulically-Operated Valve Assemblies in Light-Water Reactor Power Plants,' to provide an alternative to the Code stroke-time testing provisions." Regulatory Guide 1.192, "Operation and Maintenance Code Case Acceptability, ASME OM Code," allows licensees with an applicable Code of Record to implement ASME Code Case OMN-12, Revision 0 (with certain conditions) in lieu of the Code provisions for stroke-time testing. BVPS Unit Nos. 1 and 2 have implemented ASME OM Code Case OMN-12 for certain AOVs in lieu of the stroke-time provisions specified in ISTC-5130, "Pneumatically Operated Valves." Position verification testing for these AOVs is currently required to be performed once every two years in accordance with ISTC-3700, "Position Verification Testing," which does not coincide with the periodic test frequency of paragraph 4.2.2 under OMN-12. Performing position verification testing when maintenance personnel are at the valve locally performing diagnostic testing in accordance with OMN-12 will reduce personnel radiation exposure.

5.0 Proposed Alternative and Basis for Use

The AOV verification testing as described by ISTC-3700, "Position Verification Testing," will be performed at the AOV diagnostic test frequency specified in ASME Code Case OMN-12, Paragraph 4.2.2, "Periodic Test Requirements," in lieu of the frequency specified in ISTC-3700. ASME has determined that the diagnostic test frequency specified in OMN-12 is sufficient to ensure the capability of the valve to perform its intended function. Implementation of the ASME Code Case OMN-12 diagnostic test frequency in lieu of the frequency specified in ISTC-3700 provides an acceptable level of quality and safety for the determination of accurate valve position indication and operational readiness.

Furthermore, in accordance with ISTC-3310, "Effects of Valve Repair, Replacement, or Maintenance on Reference Values," if a maintenance activity that has the potential to affect position indication is performed between diagnostic tests, then position verification testing will be performed as a post-maintenance test regardless of the frequency determined by OMN-12.

6.0 Duration of Proposed Alternatives

The proposed alternative identified in this relief request shall be utilized during the remainder of the BVPS Unit No. 1 fourth 10-Year Inservice Test Interval and the remainder of the BVPS Unit No. 2 third 10-Year Inservice Test Interval.

7.0 Precedent

A similar request (VRR1) for motor operated valves (MOVs) was approved for the BVPS Unit No.1 fourth 10-Year Inservice Test Interval and the BVPS Unit No. 2 third 10-Year Inservice Test Interval to allow position verification testing to be performed at the OMN-1 diagnostic test frequency.

8.0 References

U.S. Nuclear Regulatory Commission letter, Beaver Valley Power Station, Unit No. 1, Docket No. 50-334, Safety Evaluation for Valve Relief Request No. 1 (VRR1) for the Fourth 10-Year Interval for Pumps and Valves Inservice Testing Program (TAC Nos. MD5118-MD5131), dated September 27, 2007.

U.S. Nuclear Regulatory Commission letter, Beaver Valley Power Station, Unit No. 2, Docket No. 50-412, Safety Evaluation for Valve Relief Request No. 1 (VRR1) for the Third 10-Year Interval for Pumps and Valves Inservice Testing Program (TAC Nos. MD5595-MD5604), dated February 14, 2008.