



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

October 21, 2010

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 – SUPPLEMENTAL  
INFORMATION NEEDED FOR ACCEPTANCE OF REQUESTED LICENSING  
ACTION RE: RELIEF REQUEST VRR2 (TAC NOS. ME4363 AND ME4364)

Dear Mr. Harden:

By letter dated August 30, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML102450056), FirstEnergy Nuclear Operating Company (the licensee) submitted a relief request for Beaver Valley Power Station, Unit Nos. 1 and 2 (BVPS-1 and 2). The proposed relief request would authorize an alternative to perform position verification testing of certain air operated valve assemblies at the diagnostic test frequency described in American Society of Mechanical Engineers Operations and Maintenance 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]." The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this relief request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Pursuant to Sections 50.55a(a)(3)(i) and 50.55a(a)(3)(ii) of Title 10 of the *Code of Federal Regulations* (10 CFR), the applicant shall demonstrate that the proposed alternatives would provide an acceptable level of quality and safety, or that compliance with the specified requirements of Section 50.55a would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety.

The NRC staff has reviewed your application and concluded that the information delineated in the enclosure to this letter is necessary to enable the NRC staff to make an independent assessment regarding the acceptability of the proposed relief request in terms of regulatory requirements and the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that the licensee supplement the application to address the information requested in the enclosure by November 3, 2010. This will enable the NRC staff to begin its detailed technical review. If the information responsive to the NRC staff's request is not received by the above date, the application will not

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be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its review activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

The information requested and associated time frame in this letter was discussed with Phil Lashley of your staff on October 15, 2010.

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

Sincerely,

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

Nadiyah S. 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

Enclosure:  
As stated

cc w/encl: Distribution via Listserv

SUPPLEMENTAL INFORMATION NEEDED

RELIEF REQUEST VRR2

FIRSTENERGY NUCLEAR OPERATING COMPANY

BEAVER VALLEY POWER STATION, UNIT NOS. 1 AND 2

DOCKET NOS. 50-334 AND 50-412

1. Provide a list of valves that are affected by the relief request.
2. Provide a discussion on how the valves test frequency is developed. Explain how the proposed alternative will maintain the same level of quality and safety.
3. The proposed alternative suggests that the request only applies to high safety significant valve assemblies. Explain how the valves are selected to apply OM Code Case OMN-12 test methods.
4. Provide a discussion as to why Code Case OMN-12 meets or exceeds the requirements of ISTC-3700. If the licensee's program utilizing Code Case OMN-12 has other local observation that supplements obturator indication verification, it should be included in the supporting discussion on why the alternative provides reasonable assurance that the component is operationally ready.
5. If reducing radiation exposure is the main reason for requesting this relief, explain how your test program via Code Case OMN-12 is adequate and that performance of position verification testing on a 2-year schedule is a hardship without an increase in quality or safety.

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Sincerely,

*/ra/*

Nadiyah S. 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

Enclosure:  
As stated

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