

## Whited, Jeffrey

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**From:** Whited, Jeffrey  
**Sent:** Wednesday, October 09, 2013 4:18 PM  
**To:** Rodriguez, Veronica  
**Cc:** Ennis, Rick; Lupold, Timothy; McMurtray, Anthony; Lehman, Bryce; Spindler, David; Carfang, Erin  
**Subject:** NRC Verbal Approval for Beaver Valley Power Station Unit 1 Relief Request BV1-IWE-2-3

Ms. Veronica Rodriguez,

In accordance with Nuclear Reactor Regulation (NRR) Office Instruction LIC-102, "Relief Request Reviews," (Agencywide Documents Access and Management System (ADAMS) Accession No. ML091380595) the staff may provide verbal approval of relief requests provided:

- The proposed alternative is in writing and all information that the staff requires to write the SE has been docketed.
- An identified need for the verbal authorization is recognized given the circumstances of the licensee's request.
- The NRC technical staff has completed its review and determined that the proposed alternative is technically justified, but has not yet formally documented it in an SE.
- The technical branch and the Division of Operating Reactor Licensing (DORL) branch chiefs have agreed to the verbal authorization.

It is the Office of Nuclear Reactor Regulation (NRR) staff's understanding that Beaver Valley Power Station, Unit 1 is currently in a refueling outage and that approval of Relief Request BV1-IWE-2-3 is necessary before the facility can enter MODE 4. It is also NRR's understanding that Beaver Valley Unit No. 1 currently plans to enter MODE 4 before NRR staff can formally document the approval of Relief Request BV1-IWE-2-3. Therefore, the staff believes that the above criteria for granting temporary verbal approval has been met. Temporary verbal approval is being granted via the script below and the staff expects to provide a written safety evaluation within 150 days of today's date.

The purpose of this e-mail to document the verbal authorization of the subject relief request in accordance with LIC-102.

Participants in today's discussion were:

From the NRC:

Timothy Lupold, Chief, Component Performance, NDE, and Testing Branch, Division of Engineering  
Anthony McMurtray, Chief, Mechanical and Civil Engineering Branch, Division of Engineering  
Richard B. Ennis, Acting Chief, Plant Licensing Branch I-2, DORL  
Bryce Lehman, Mechanical and Civil Engineering Branch, Division of Engineering  
Jeffrey Whited, Beaver Valley Project Manager, DORL  
David Spindler, Senior Resident Inspector, Beaver Valley Power Station

From the licensee:

Charles Mcfeaters - Site Engineering Director  
Carmen Mancuso - Design Engineering Manager  
Mike Testa - Design Engineering  
Thomas Lentz - Manager, Fleet Licensing  
Phil Lashley - Fleet Licensing

Ken McMullen - Fleet Licensing  
Brian Sepelak -Site Compliance  
Dave Grabski - Technical Services  
Tom Westbrook - Design Engineering  
Dean Hecht - Technical Services  
Dave Zelenko - Technical Services  
Mike Ressler - Design Engineering

[Timothy Lupold speaking]

By letter dated October 7, 2013 (ADAMS Accession No. ML13281A477), FirstEnergy Nuclear Operating Company (the licensee) submitted request BV1-IWE-2-3 to the Nuclear Regulatory Commission (NRC). The licensee requested to use alternative requirements to the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, "Rules for Inservice Inspection (ISI) of Nuclear Power Plant Components," for Beaver Valley Power Station, Unit 1 (BVPS-1). As an alternative to the detailed visual examination required during a pressure test for a containment liner pressure boundary weld, the licensee proposed a visual examination (VT-1) of the liner repair weld prior to and after the required pressure test.

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(a)(3)(i), the licensee requested to use the alternative to the ASME Code, Section XI noted above on the basis that the alternative provides an acceptable level of quality and safety.

Per the licensee's submittal, "during the fall 2013 maintenance and refueling outage for BVPS-1, a coatings examination of the painted internal surface of the containment liner plate identified a surface defect. Subsequent surface cleaning revealed the surface defect as a through-wall hole in the containment liner plate. The area of the through-wall hole was approximately 0.42 inches by 0.29 inches. Repairs include removing the degraded portion of the liner plate and welding a replacement plate in place."

Following the repairs, a pneumatic leakage test is required in accordance with IWE-5221. The licensee plans to perform a local leak rate test on the repaired area; however, the test requires the use of a rig which will make the internal areas affected by the repair activities inaccessible for direct visual inspection during the local leak rate test. The outside surface of the repair is covered with concrete and is therefore inaccessible. Relief is requested from the direct visual examination requirement specified in sub-article IWE-5240 during the leakage test required by sub-article IWE-5221.

The NRC staff noted that the test rig employed to perform the local leak rate pressure test will cover the repaired areas of the containment liner, making the liner inaccessible during the leak test. To address this, the licensee will conduct a VT-1 visual examination of the repair prior to the local leak test and after completion of the leak test. The VT-1 examination meets all of the requirements of the visual examination required by Paragraph IWE-5240 of the ASME Code, Section XI. The visual examinations provide assurance that the repaired area is free of abnormalities before and after the leak test, while the leak test itself assures the integrity of the repair weld.

Since the VT-1 examination is as detailed as the code required examination, and since conducting the examination after the pressure test has previously been found acceptable, the NRC staff finds that implementation of the proposed alternative for the remainder of the current BVPS-1 ISI interval is acceptable.

[Richard Ennis speaking]

As set forth above, the NRC staff determined that the proposed alternative, BV1-IWE-2-3, provides an acceptable level of quality and safety. Accordingly, the NRC staff concludes that the licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(a)(3)(i) and is in compliance with the ASME Code, Section XI requirements. All other ASME Code, Section XI requirements for which relief was not specifically requested and approved remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

Therefore, the NRC staff authorizes the proposed alternative, BV1-IWE-2-3, at BVPS-1 for the purpose of meeting post-repair visual inspections requirements for the steel containment liner. The proposed alternative is authorized for use during the fourth 10-year ISI interval, which is scheduled to end March 31, 2018.

[Conclusion of discussion]

A copy of this email will be made publicly available in ADAMS.

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