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REQUEST FOR ADDITIONAL INFORMATION

OFFICE OF NUCLEAR REACTOR REGULATION

REQUEST FOR ADDITIONAL INFORMATION RELATED TO A LICENSE AMENDMENT

REQUEST TO EXTEND CONTAINMENT LEAKAGE TEST FREQUENCY

BEAVER VALLEY POWER STATION – UNITS 1 AND 2

DOCKET NO. 50-344 AND 50-412

By letter dated April 16, 2014,<sup>1</sup> FirstEnergy Nuclear Operating Company (the licensee) submitted a license amendment request for Beaver Valley Power Station (BVPS) Units 1 and 2. The proposed amendment would modify BVPS Technical Specification 5.5.12, “Containment Leakage Rate Testing Program,” Item a, be deleting reference to the BVPS-1 exemption letter dated December 5, 1984,<sup>2</sup> and requiring compliance with Nuclear Energy Institute (NEI) topical report NEI 94-01, Revision 3-A,<sup>3</sup> “Industry Guideline for Implementing Performance-Based Option of [Title 10 to the *Code of Federal Regulations*] 10 CFR Part 50 Appendix J,” instead of Regulatory Guide 1.163,<sup>4</sup> “Performance Based Containment Leak Test Program,” including listed exceptions. This change will allow BVPS 1 and 2 to extend the Type A reactor containment test, required by 10 CFR Part 50 Appendix J, test interval from one test in 10 years up to one test in 15 years and extension of the Type C test interval up to 75 months. To complete its review, the Nuclear Regulatory Commission (NRC) staff in the Mechanical and Civil Engineering Branch (EMCB) request a response to the questions below.

- EMCB RAI 1      The first five rows in the “Scheduled Outage” column of the table in Section 3.2.1, “Containment Inservice Inspection Program”, on page 21 of 54 of the licensee’s submittal list “1R25, 1R28, 1R30,” and the 10<sup>th</sup> and 11<sup>th</sup> rows list “2R20, 2R23, 2R24.”
- a. Explain why 1R27, 1R29 and 1R31 are not listed for the first five rows and 2R22 is not listed for rows 10 and 11.
  - b. Also, in the same table, 4<sup>th</sup> column, “Exam Method”, explain why VT-3 examination is performed once per 10-year interval for 1-CNMT-SPARE-PENE-BOLTING, and 2-CNMT-ELEC-PENE-BOLTING.
- EMCB RAI 2      Section 3.1.2, “Type B and C Testing” and Tables on pages 12 and 13 of 54 of Reference 1, describes Type B and C testing and leak rate summation history for Units 1 and 2 (respectively), which indicated the as-found minimum pathway summations, and the as-left maximum pathway summations,

<sup>1</sup> Agencywide Documents Access and Management System (ADAMS) Accession No. ML14111A291.

<sup>2</sup> ADAMS Accession No. ML003766713.

<sup>3</sup> ADAMS Accession No. ML12221A202.

<sup>4</sup> ADAMS Accession No. ML003740058.

representing the effective management of the Containment Leakage Rate Testing Program. In order for the NRC staff to assess the proper and effective implementation of the Type B and Type C local leak rate testing program for each unit, please provide the following:

- a. For the last two consecutive periodic tests, please provide a table that has (1) the component(s) that have not demonstrated acceptable performance, (2) the as-found value, (3) the acceptable value, (4) the as-left value, (5) the causes of the test failure, (6) the corrective actions taken, and (7) the next test schedule intervals.
- b. A discussion of any operating experience and evaluation results, regarding the potential for, or presence of, corrosive conditions at the concrete-to-metal interface at the basement floor of the containment. The discussion should include the potential for stagnant water to be trapped behind a degraded floor seal (moisture barrier) area that could promote pitting corrosion. This item is requested to be consistent with NRC Information Notice 2004-09, "Corrosion of Steel Containment and Containment Liner."