

**Gregory H. Halnon**  
Vice President, Regulatory Affairs

December 23, 2017  
L-17-372

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  
Docket No. 50-334, License No. DPR-66  
Docket No. 50-412, License No. NPF-73

Davis-Besse Nuclear Power Station  
Docket No. 50-346, License No. NPF-3

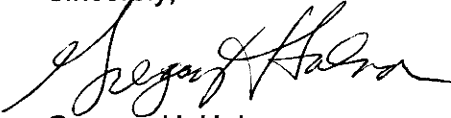
Perry Nuclear Power Plant  
Docket No. 50-440, License No. NPF-58  
Response to Request for Additional Information Regarding Request to Use  
ASME Code Case N-513-4 (EPID 000976/05000334/L-2017-LLR-0088,  
000976/05000346/L-2017-LLR-0088, 000976/05000412/L-2017-LLR-0088, and  
000976/05000440/L-2017-LLR-0088)

By letter dated August 11, 2017 (Accession Number ML17227A324), FirstEnergy Nuclear Operating Company (FENOC) requested Nuclear Regulatory Commission (NRC) approval to use ASME Code Case N-513-4, "Evaluation Criteria for Temporary Acceptance of Flaws in Moderate Energy Class 2 or 3 Piping, Section XI, Division 1," with limits on leakage for the evaluation and temporary acceptance of flaws in moderate energy piping in lieu of certain ASME Code, Section XI, requirements.

By e-mail dated December 11, 2017, the NRC requested additional information to complete its review of the FENOC request. The FENOC response to the NRC request for information is attached to this letter.

There are no regulatory commitments contained in this submittal. If there are any questions or if additional information is required, please contact Mr. Thomas A. Lentz, Manager – Fleet Licensing, at (330) 315-6810.

Sincerely,

  
Gregory H. Halnon

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Davis-Besse Nuclear Power Station,  
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**Attachment:**

**Response to Request for Additional Information Regarding Request to  
Use ASME Code Case N-513-4**

**cc:**

**NRC Region I Administrator  
NRC Region III Administrator  
NRC Resident Inspector – Beaver Valley  
NRC Resident Inspector – Davis-Besse  
NRC Resident Inspector – Perry  
NRC Project Manager – FENOC Fleet  
Director BRP/DEP  
Site BRP/DEP Representative  
Utility Radiological Safety Board**

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Response to Request for Additional Information Regarding Request to  
Use ASME Code Case N-513-4  
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The NRC staff's request for additional information is provided below in bold text, followed by the FENOC response.

**Request for Additional Information**

**Section 5, "Proposed Alternative and Basis for Use," of the proposed alternative in the licensee's August 11, 2017, letter states, "The critical leakage rate is determined as the highest leakage rate that can be tolerated and will be based on the allowable loss of inventory or the maximum leakage that can be tolerated relative to room flooding, among others." Confirm that the critical leakage rate will be based on the most limiting condition. For example, if the maximum allowed flooding is 50 gallons per minute (gpm) and the maximum allowed loss of inventory is 25 gpm, 25 gpm is the critical leakage rate.**

Response:

The critical leakage rate will be determined based on the most limiting condition, as described in the example.