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Cc:	Collins, Jay; Danna, James; Cumblidge, Stephen
Subject:	Acceptance Review - Beaver Valley Unit 2: Request for Alternative Examination Frequency for Reactor Vessel Nozzle to Safe-End Welds (L-2019-LLR-0013)
Date:	Monday, March 11, 2019 8:43:00 AM

Phil,

By letter dated February 20, 2019 (Agencywide Document Access and Management System (ADAMS) Accession No. ML19051A108), FirstEnergy Nuclear Operating Company (FENOC) submitted a request for an alternative examination frequency for cold leg reactor vessel inlet nozzle to safe-end welds at Beaver Valley Power Station, Unit No. 2. Specifically, FENOC is proposing an alternative to the American Society of Mechanical Engineers' Boiler and Pressure Vessel Code Case N-770-2 inspection frequency requirements to volumetrically examine the reactor vessel cold leg nozzle to safe-end welds every second inspection period, not to exceed 7 years.

The purpose of this email 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(z)(1) and 50.55a(z)(2) 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 it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed alternative in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request will take approximately 150 hours to complete. The NRC staff expects to complete this review by your requested date of February 28, 2020. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date (greater than a month) or significant changes in the forecasted hours (greater than 25%), the reasons for the changes, along with the new estimates will be communicated, during the routine interactions with the assigned project manager.

These estimates are based on the staff's initial review of the application and they could change, due to several factors including requests for additional information and unanticipated addition of scope to the review. Additional delay may occur if the submittal is provided to the NRC in advance or in parallel with industry program initiatives or pilot applications.

If you have any questions, please contact me.

## Carleen

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