



Energy Harbor Nuclear Corp.
Beaver Valley Power Station
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Rod L. Penfield
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724-682-5234

April 3, 2020
L-20-125

10 CFR 50.55a

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT:
Beaver Valley Power Station, Unit No. 2
Docket No. 50-412, License No. NPF-73
Response to Request for Additional Information Regarding 10 CFR 50.55a Request
Number SRR-1, Revision 0, Snubber Testing

By letter dated April 1, 2020 (Accession Number ML20092K031) Energy Harbor Nuclear Corp. requested approval of 10 CFR 50.55a request SRR-1 in accordance with 10 CFR 50.55a(z)(2) to defer operational readiness testing of Beaver Valley Power Station, Unit No. 2 (BVPS-2) snubbers that was to be performed during the upcoming refueling outage.

On April 2, 2020, the Nuclear Regulatory Commission (NRC) staff requested additional information to complete their review. The response to the NRC staff's request for additional 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. Phil H. Lashley, Acting Manager, Nuclear Licensing and Regulatory Affairs, at (330) 315-6808.

Sincerely,

A handwritten signature in black ink, appearing to read "Rod L. Penfield", written in a cursive style.

Rod L. Penfield

Attachment:
Response to April 2, 2020 Request for Additional Information Regarding
10 CFR 50.55a Request Number SRR-1, Revision 0

Beaver Valley Power Station, Unit No. 2

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cc: NRC Region I Administrator
NRC Resident Inspector
NRR Project Manager
Director BRP/DEP
Site BRP/DEP Representative

ATTACHMENT

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Response to April 2, 2020 Request for Additional Information Regarding
10 CFR 50.55a Request Number SRR-1, Revision 0

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The NRC staff's request for additional information (RAI) is provided below in bold text and is followed by the Energy Harbor Nuclear response.

RAI 1

In Section 5, "Proposed Alternative and Basis for Use," the licensee states the following:

As an alternative to Subsection ISTD-5200 of the OM Code, Energy Harbor Nuclear Corp. proposes to cancel the operational readiness testing of snubbers during the 2R21 refueling outage. Snubber testing to meet Subsection ISTD-5200 will resume during the next scheduled refueling outage 2R22.

Please clarify: The NRC staff does not consider this alternative request to constitute cancellation of the ASME OM Code snubber testing program. The staff considers this alternative request to propose a one-time extension of the ASME OM Code Inservice testing (IST) program for specific snubbers to the next refueling outage in the spring of 2022 in accordance with 10 CFR 50.55a(z)(2) where compliance with these specific IST requirements would result in hardship without a compensating increase in the level of quality and safety.

Response:

References to cancellation of operational readiness testing of snubbers in request number SRR-1 are to be clarified as described below.

The following sentence replaces the first sentence of the fifth paragraph in Section 4, "Reason for Request."

Because of the hardships caused by the COVID-19, Energy Harbor Nuclear Corp. is requesting a one-time extension of operational readiness testing of snubbers scheduled for the 2R21 refueling outage.

The following wording replaces the description of the proposed alternative in the first paragraph of Section 5, "Proposed Alternative and Bases for Use."

Energy Harbor Nuclear Corp. requests a one-time extension of the ASME OM Code Inservice Testing (IST) program, ISTD-5200, for Beaver Valley Power Station Unit No. 2 (BVPS-2) snubbers from refueling outage 2R21 to the next refueling outage 2R22. Activities for Service Life Monitoring will be performed during refueling outage 2R21, as required, to ensure service life will not be exceeded. Inservice testing of BVPS-2 snubbers will resume in alignment with ISTD-5200 with sampling performed in accordance with the 10 percent plan contained in ISTD-5300 and the Service Life Monitoring program during refueling outage 2R22.

The following sentence replaces the second sentence of the tenth (last) paragraph in Section 5.

Therefore, the proposed Subsection ISTD-5200 alternative to permit a one-time extension of snubber operational readiness testing from refueling outage 2R21 to refueling outage 2R22 provides reasonable assurance that the snubbers are operationally ready.

The following sentence replaces the second and third sentences of the paragraph provided in Section 6, "Duration of the Proposed Alternative."

The proposed alternative would permit a one-time extension of snubber operational readiness testing per ISTD-5200 from refueling outage 2R21 to the next refueling outage 2R22.

RAI-2

Section 1, "ASME Code Components Affected," lists the snubbers within the scope of the alternative request, including their Service Life Expiration dates. When were these Service Life Expiration dates calculated?

Response:

Service Life Monitoring evaluations are performed at Beaver Valley Power Station in accordance with ASME OM Code, Subsection ISTD-6200, in which an evaluation of the unit snubber population is performed each fuel cycle. The last performance of ISTD-6200 was following refueling outage 2R20 in fall 2018. For snubbers that contained service life expiration dates prior to 2R22, technical evaluations have been performed to justify extension, per ISTD-6200, or service life monitoring activities are being performed during refueling outage 2R21 to ensure service life will not be exceeded.

RAI-3

In Section 5, the licensee states that snubbers denoted by an asterisk (*) in Section 1 are snubbers that require Service Life Maintenance to be performed during refueling outage 2R21 to extend service life to the date listed. In addition to the snubbers denoted by an asterisk, the staff notes that snubbers 2MSS-PSSP103 and 2MSS-PSSP151B have Service Life Expiration dates in 2022 and 2021, respectively. Are these two snubbers accessible for a visual examination during 2R21?

Response:

The snubbers, 2MSS-PSSP103 and 2MSS-PSSP151B will be accessible during refueling outage 2R21, and a walkdown visual examination will be performed.

RAI-4

In Section 5, the licensee references IRIS OE 475511 for operating experience regarding the large bore snubbers at the plant. A summary of this operational experience is needed for the NRC to evaluate this request and make a regulatory finding.

Response:

The referenced document (IRIS OE 475511) identified a deficiency in the testing of large bore hydraulic snubbers, which are used to support the steam generators at both Beaver Valley Power Station Unit Nos. 1 and 2. Large bore snubbers are tested in accordance with the American Society of Mechanical Engineers, Operations and Maintenance Code (2004 Edition up to 2006 Addenda), Subsection ISTD-5225, that requires monitoring per ISTD-6400(b). The required testing to monitor the internal piston seals was found to be deficient. This condition is being addressed in the corrective action program. As a result, a functionality assessment was performed and it was determined that there is reasonable assurance that the snubbers will continue to operate as expected.