

From: Tobin, Jennifer
To: rpenfield@firstenergycorp.com
Cc: [Lashley, Phil H \(EH\)](#); [McCreary, Dave M \(EH\)](#)
Subject: Verbal Relief for Appendix I Safety Relief Valves - Delivered 4/7/2020 at 11:00 am
Date: Tuesday, April 07, 2020 11:15:00 AM

Good afternoon Mr. Penfield,
Please find below a written documentation of the verbal relief that NRC provided this morning (4/7/2020). This email will be made publicly available.

Please contact me with questions or concerns.

Thanks!
-Jenny

VERBAL AUTHORIZATION BY THE NRC OFFICE OF NUCLEAR REACTOR
REGULATION FOR 10 CFR 50.55a REQUEST L-20-114-VRR5, REVISION 0, RELIEF
VALVE TEST FREQUENCY

BEAVER VALLEY POWER STATION, UNIT 2

ENERGY HARBOR

DOCKET NO. 50-412

APRIL 7, 2020

Technical Evaluation read by Thomas G. Scarbrough, Acting Chief, Mechanical Engineering and Inservice Testing Branch, Division of Engineering and External Hazards, NRC Office of Nuclear Reactor Regulation

By letter dated April 1, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20092L517), Energy Harbor (the licensee) proposed an alternative to specific requirements in the American Society of Mechanical Engineers (ASME) *Code for Operation and Maintenance of Nuclear Power Plants* (OM Code), 2004 Edition through 2006 Addenda, for Beaver Valley Power Station (BVPS), Unit 2, pursuant to Title 10 of the *Code of Federal Regulations*, Part 50, Section 55a (10 CFR 50.55a).

In particular, the licensee submitted 10 CFR 50.55a Request L-20-114-VRR5, Revision 0, Relief Valve Test Frequency, on April 1, 2020, requesting NRC authorization to extend the testing interval for 7 specific relief valves at Beaver Valley Unit 2 listed in the request from the upcoming refueling outage (2R21) scheduled to begin on April 12, 2020, to the following refueling outage (2R22) set to begin on October 10, 2021. The licensee provided justification that compliance with the provisions in ASME OM Code, Appendix I, "Inservice Testing of Pressure Relief Devices in Light-Water Reactor Nuclear Power Plants," paragraph I-1350, "Test Frequency, Classes 2 and 3 Pressure Relief Valves," subparagraph (a), "10-year Test Interval;" and paragraph I-1390, "Test Frequency, Classes 2 and 3 Pressure Relief Devices That Are Used for Thermal Relief Application," as incorporated by reference in 10 CFR 50.55a, to conduct testing of the relief valves at this time would result in a hardship without a compensating increase in the level of quality and safety in accordance with 10 CFR 50.55a(z)(2).

In its alternative request, the licensee stated that testing of the relief valves listed in the request at this time at Beaver Valley Unit 2 would represent a hardship during this COVID-19 outbreak, because the licensee intends to reduce the amount of personnel on site to prevent the spread of COVID-19 at BVPS. The licensee is also contingency planning in case some of its workforce becomes unavailable due to the COVID-19 outbreak. To support its request to extend the testing of the relief valves until the next refueling outage set to begin on October 10, 2021, the licensee provided detailed test results for the 7 relief valves (one pressure relief valve and six thermal relief valves). The pressure relief valve in

the residual heat removal (RHR) system is among a group of three relief valves with the latest valve tested in November 2018. The licensee reports that the RHR relief valve listed in its submittal has shown good performance over the past 31 years. The remaining six valves are thermal relief valves with each valve tested during refueling outage 2R15 in the spring of 2011. These thermal relief valves either passed its setpoint test at that time; or if not, were refurbished and successfully retested or were replaced with a new relief valve that was successfully tested.

The licensee notes that the 6-month grace period allowed in ASME OM Code Case OMN-20, "Inservice Test Frequency," which is accepted in NRC Regulatory Guide (RG) 1.192, "Operation and Maintenance Code Case Acceptability, ASME OM Code," as incorporated by reference in 10 CFR 50.55a, is insufficient to extend the test interval for these relief valves until refueling outage 2R22. The licensee is requesting an additional 2.5 months of grace beyond the Code Case OMN-20 grace period. The licensee considers that the test results for these relief valves show limited time-related degradation or setpoint drift, and demonstrates that it is acceptable to extend the test interval for these relief valves to align with refueling outage 2R22.

Based on the information described above for the 7 relief valves at Beaver Valley Unit 2 identified in the licensee's submittal, the NRC staff finds that previous testing of the current, refurbished, or new relief valves demonstrates that the short-time extension of the test interval for these specific relief valves is acceptable in light of the hardship to conduct team-oriented testing of these relief valves at this time that would be contrary to the health and safety of plant personnel.

Therefore, the NRC finds that the licensee's proposed alternative for a one-time extension of the testing interval for the 7 specified relief valves at Beaver Valley Unit 2 in accordance with 10 CFR 50.55a(z)(2) will provide reasonable assurance that the relief valves will be operationally ready to perform their safety functions until the next refueling outage in the fall of 2021. All other ASME OM Code requirements as incorporated by reference in 10 CFR 50.55a for which relief or an alternative was not specifically requested and approved in this subject request remain applicable. If the licensee identifies a performance issue with any of these relief valves, the licensee will be expected to take action to implement the requirements of its Technical Specifications. This authorization will remain in effect until restart from the next refueling outage for Beaver Valley Unit 2 in the fall of 2021. The licensee's testing plans for these relief valves may be adjusted as appropriate by any subsequent NRC-authorized alternative requests.

**Authorization read by James Danna, Chief of the Plant Licensing Branch I,
Office of Nuclear Reactor Regulation**

As Chief of the Plant Licensing Branch I, Office of Nuclear Reactor Regulation, I agree with the conclusions of the Mechanical Engineering and Inservice Testing Branch.

The NRC staff concludes that the proposed relief for Beaver Valley, Unit 2 will provide reasonable assurance of adequate safety until the next scheduled refueling outage in the fall of 2021 when testing of 7 specific relief valves may be performed.

The NRC staff finds that complying with the requirements of the ASME OM Code, as required by 10 CFR 50.55a, would result in hardship or unusual difficulty without a compensating increase in the 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(z)(2).

Therefore, effective April 6, 2020, the NRC authorizes the use of the proposed alternative at Beaver Valley, Unit 2 until completion of the next scheduled refueling outage, scheduled for the fall of 2021. All other requirements in ASME OM Code for which relief was not specifically requested and approved in this relief request remain applicable.

This verbal authorization does not preclude the NRC staff from asking additional clarification questions regarding the proposed relief while subsequently preparing the written safety evaluation.