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Subject: Verbal Relief for CIVs - Delivered 4/8/2020 at 10:00 am
Date: Wednesday, April 08, 2020 10:21:00 AM

Good afternoon Mr. Penfield,
Please find below a written documentation of the verbal relief that NRC provided this morning (4/8/2020). 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-20-127-VRR4, REVISION 0, ISOLATION
VALVE TEST FREQUENCY

BEAVER VALLEY POWER STATION, UNIT 2

ENERGY HARBOR

DOCKET NO. 50-412

APRIL 8, 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 6, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20097C373), 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-20-127-VRR4, Revision 0, Containment Isolation Valve Test Frequency, on April 6, 2020, requesting NRC authorization to extend the performance of leakage testing for 35 specific isolation valves at Beaver Valley Unit 2 listed in the submittal. The licensee submitted the request on April 6, 2020, as a supplement to a previous request dated April 2, 2020, (ADAMS Accession No. ML20093C288) that had proposed an alternative to the ASME OM Code requirements for the isolation valve leakage testing program at BVPS. The NRC staff's evaluation described in this Verbal Authorization applies only to the 35 specific isolation valves at Beaver Valley Unit 2 listed in the submittal dated April 6, 2020.

In its submittal dated April 2, 2020, the licensee provided justification that compliance with the provisions in ASME OM Code, Subsection ISTC, "Inservice Testing of Valves in Light-Water Reactor Nuclear Power Plants," paragraph ISTC-3630, "Leakage Rate for Other Than Containment Isolation Valves," subparagraph (a), "Frequency," as incorporated by reference in 10 CFR 50.55a, to conduct leakage testing of isolation valves every 2 years 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), if performed at this time. For example, the licensee indicated that the performance of leakage testing of isolation valves at this time 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.

In its submittal dated April 2, 2020, the licensee reported that its review of the leakage test results for the specific isolation valves at Beaver Valley Unit 2 showed that the valves maintained a history of excellent performance, with the exception of a reactor coolant system loop fill header flow control valve that failed its leakage test in 2012 but, after adjustments, has demonstrated acceptable performance since then. The licensee considers that the performance of these isolation valves with acceptable results for at least two consecutive outages prior to submittal of its request supports an extension of the leakage test interval for these valves.

Based on the information described above for the 35 isolation valves at Beaver Valley Unit 2 identified in the licensee's submittal, the NRC staff finds that (1) previous leakage testing of these isolation valves indicates their acceptable historical performance; (2) no current concerns with the performance of these isolation valves have been identified; (3) periodic maintenance activities are not modified by this request; and (4) a hardship exists for the performance of team-oriented leakage testing of these isolation 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, submitted in accordance with 10 CFR 50.55a(z)(2), will provide reasonable assurance that the specified 35 isolation valves at Beaver Valley Unit 2 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 request dated April 6, 2020, remain applicable. If the licensee identifies a performance issue with any of these isolation 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. This Verbal Authorization is applicable to the extension of the leakage testing interval for the 35 isolation valves specified in the licensee's request dated April 6, 2020, from the upcoming refueling outage (2R21) scheduled to begin in April 2020, to the following refueling outage (2R22) planned for the fall of 2021. The NRC staff review of the proposal in the licensee's submittal dated April 2, 2020, to modify the isolation valve leakage testing program at BVPS will be conducted through a separate safety evaluation. The licensee's leakage testing plans for these isolation 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 leakage testing for the 35 specific isolation valves may be performed.

The NRC staff finds that complying with the requirements of the ASME OM Code, Subsection ISTC, 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 8, 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.