Mr. J. E. Cross President-Generation Group Duquesne Light Company Post Office Box 4 Shippingport, PA 15077

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) REGARDING REVIEW OF BEAVER

VALLEY POWER STATION (BVPS), UNIT NOS. 1 AND 2, TECHNICAL SPECIFICATION CHANGE TO ALLOW USE OF STEAM GENERATOR TUBE SLEEVES DESIGNED BY ABB/COMBUSTION ENGINEERING (TAC NOS. M98137 AND M98138)

Dear Mr. Cross:

By letter dated March 10, 1997, Duquesne Light Company (DLC) submitted an amendment request to modify Technical Specification 3.4.5 to allow steam generator tube sleeving using the Combustion Engineering (CE) process. The NRC staff has initiated review of the proposed amendment but has determined that additional information is required to complete the review. The required additional information is identified in the enclosed RAI. DLC is requested to provide the additional information within 30 days of receipt of this letter, so that the NRC staff may complete the review within a timely manner.

Should you have any questions on this matter, please contact me at (301) 415-1409.

Sincerely,

/S/ T. Liu for

Donald S. Brinkman, Senior Project Manager Project Directorate I-2 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Docket Nos. 50-334/412

Enclosure: RAI

cc w/encl: See next page

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#### UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

June 23, 1997

Mr. J. E. Cross President-Generation Group Duquesne Light Company Post Office Box 4 Shippingport, PA 15077

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) REGARDING REVIEW OF BEAVER

VALLEY POWER STATION (BVPS), UNIT NOS. 1 AND 2, TECHNICAL SPECIFICATION CHANGE TO ALLOW USE OF STEAM GENERATOR TUBE SLEEVES DESIGNED BY ABB/COMBUSTION ENGINEERING (TAC NOS. M98137 AND M98138)

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Enclosure: RAI

cc w/encl: See next page

J. E. Cross Duquesne Light Company

CC:

Jay E. Silberg, Esquire Shaw, Pittman, Potts & Trowbridge 2300 N Street, NW. Washington, DC 20037

Director-Safety and Licensing Department (BV-A) Duquesne Light Company Beaver Valley Power Station PO Box 4 Shippingport, PA 15077

Commissioner Roy M. Smith West Vieginia Department of Labor Building 3, Room 319 Capitol Complex Charleston, WVA 25305

Director, Utilities Department Public Utilities Commission 180 East Broad Street Columbus, OH 43266-0573

Director, Pennsylvania Emergency Management Agency Post Office Box 3321 Harrisburg, PA 17105-3321

Ohio EPA-DERR ATTN: Zack A. Clayton Post Office Box 1049 Columbus. OH 43266-0149

Dr. Judith Johnsrud National Energy Committee Sierra Club 433 Orlando Avenue State College, PA 16803

Duquesne Light Company Beaver Valley Power Station PO Box 4 Shippingport. PA 15077 ATTN: R. L. Grand. Division Vice President. Nuclear Operations Group and Plant Manager (BV-SOSB-7) Beaver Valley Power Station Units 1 & 2

Bureau of Radiation Protection Pennsylvania Department of Environmental Resources ATTN: Michael P. Murphy Post Office Box 2063 Harrisburg, PA 17120

Mayor of the Borrough of Shippingport Post Office Box 3 Shippingport, PA 15077

Regional Administrator, Region I U.S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, PA 19406

Resident Inspector U.S. Nuclear Regulatory Commission Post Office Box 298 Shippingport, PA 15077

Duquesne Light Company Beaver Valley Power Station PO Box 4 Shippingport, PA 15077 ATTN: S. C. Jain, Vice President Nuclear Services (BV-A)

# REQUEST FOR ADDITIONAL INFORMATION REGARDING CHANGE TO TECHNICAL SPECIFICATION 3.4.5 TO

## ALLOW STEAM GENERATOR TUBE SLEEVING USING THE COMBUSTION ENGINEERING PROCESS

## BEAVER VALLEY POWER STATION, UNIT NOS. 1 AND 2

### DOCKET NOS. 50-334 AND 50-412

By letter dated March 10, 1997, Duquesne Light Company (DLC) submitted a license amendment request to modify Technical Specification (TS) 3.4.5 to allow steam generator tube sleeving using the Combustion Engineering (CE) process. The NRC staff has initiated review of the proposed amendment but has determined that additional information is necessary to completed the review. The NRC staff requests that the licensee provide response to the following comments in order for the staff to complete the review.

- 1. The licensee should confirm that the existing TS plugging/repair limit for tubes (40%) is correct or provide an appropriate revision. Historically, some TSs used certified material test report (CMTR) values for tube material strength instead of American Society of Mechanical Engineers (ASME) Code minimums. The plugging/repair limit should use the ASME Code minimum for material strength in the calculation of Code allowable flaw depth minus NDE uncertainty (20%). The staff notes that in the amendment submittal the plugging limit for the CE sleeves (32%) is calculated in this desired manner.
- 2. The licensee committed to perform post weld heat treatment (PWHT) of the freespan sleeve welds. This commitment is congruent with the staff position on PWHT. However, there is no accompanying TS wording reflecting this commitment. Consequently, the licensee should provide suitable TS wording to include PWHT in the sleeving process or the Office of Nuclear Reactor Regulation (NRR) should issue the amendment with a license condition to perform PWHT. Should the licensee decide to omit PWHT, then supporting technical justification should be submitted. Such justification should address issues including: projected impact on service life of the sleeve joints; anticipated plans for future repairs to the sleeve joints and/or steam generator replacement; and whether the omission of PWHT would result in a new or accelerated mode of degradation.
- 3. The staff believes that the licensee should adopt inspection and expansion criteria consistent with that of other facilities licensed to install sleeves. As a minimum, the initial sample selected at each inspection should include 20 percent of all sleeved tubes. Please provide appropriate wording and a table in the TS reflecting this criteria. For reference, a previously adopted table incorporated in the TSs of another licensee is attached.

Attachment: As stated

TABLE 4.4-3 STEAM GENERATOR REPAIRED TUBE INSPECTION

	T SAMPLE IN	2ND SAMPLE INSPECTION		
Sample Size	Result	Action Required	Result	Action Required
A minimum of 20% of repaired tubes (1) (2)	C-1	None	N.A.	N.A.
	C-2	Plug delective repoled tubes and inspect 100% of the repaired tubes in this S.G.	C-1	None
			C-2	Plug defective repaired tubes
			C-3	Perform action for C-3 result of 8:st sample
	C-3	Inspect all repaired tubes in this S.G., plug defective tubes and inspect 20% of the repaired tubes in each other S.G.	All other S.G.s are C-1	Hone
CONTRACTOR AND THE STATE OF THE		Notification to NRC pursuant to \$50.72 (b)(2) of 10 CFR Part 50	Some S.G.s C-2 but no additional S.G. are C-3	Perform action for C-2 result of first sample
	·		Additional S.G. ta C-3	Suspect of repaired tubes in each S.G. and plug defective subes. Notification to NRC sursuant to \$50.72 (b)(2) of 10 CFR Part 50

(1) Each repair method is considered a separate population for determination of scope expansion.
(2) The impection of repaired tubes may be performed an tubes from 1 to 4 steam generators based on outage plans.