

**From:** Vaidya, Bhalchandra  
**Sent:** Wednesday, April 28, 2021 2:18 PM  
**To:** Lashley, Phil H (EH)  
**Cc:** Farnan, Michael; Scarbrough, Thomas; Buford, Angie; Salgado, Nancy; Kuntz, Robert; Purnell, Blake; Tobin, Jennifer; Danna, James; Wolfgang, Bob  
**Subject:** ENERGY HARBOR FLEET, BEAVER VALLEY UNITS 1 AND 2 AND DAVIS-BESSE UNIT 1- ACCEPTANCE OF RELIEF REQUEST RE: PROPOSED ALTERNATIVE TO USE ASME OM CODE CASE OMN-27

**SUBJECT: ENERGY HARBOR FLEET, BEAVER VALLEY UNITS 1 AND 2 AND DAVIS-BESSE UNIT 1- ACCEPTANCE OF RELIEF REQUEST RE: PROPOSED ALTERNATIVE TO USE ASME OM CODE CASE OMN-27**

**Beaver Valley Power Station, Unit Nos. 1 and 2  
Docket No. 50-334, License No. DPR-66  
Docket No. 50-412, License No. NPF-73**

**Davis-Besse Nuclear Power Station, Unit No. 1  
Docket No. 50-346, License No. NPF-3**

**EPID-L-2021-LLR-0026**

By letter dated April 1, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21091A259), in accordance with the provisions of 10 CFR 50.55a(z)(1), Energy Harbor Nuclear Corp. hereby requested Nuclear Regulatory Commission (NRC) approval of a proposed alternative to the American Society of Mechanical Engineers Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code), Subsection ISTC, "Inservice Testing of Valves in Light-Water Reactor Power Plants," for use at Davis-Besse Nuclear Power Station (DBNPS), and Beaver Valley Power Station, Unit Nos. 1 and 2 (BVPS-1 and BVPS-2, respectively).

Specifically, Energy Harbor Nuclear Corp. requested approval to use ASME OM Code Case OMN-27, "Alternative Requirements for Testing Category A Valves (Non[1]PIV/CIV)," to determine valve test frequency in lieu of the two-year leakage rate test frequency requirement specified in ASME OM Code Section ISTC-3630(a) for Category A valves that are not reactor coolant system pressure isolation valves (PIVs) or containment isolation valves (CIVs).

The purpose of this e-mail 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 amendment 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. If additional information is needed, you will be advised by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request will take approximately 150 man-hours to complete. The NRC staff expects to complete this review in approximately 12 months, which is March 2021. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, 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 NRC 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.

Bhalchandra K. Vaidya  
US Nuclear Regulatory Commission  
Office of Nuclear Reactor Regulation  
Division of Operating Reactor Licensing  
LPL3  
301-415-3308  
Bhalchandra.vaidya@nrc.gov

**Hearing Identifier:** NRR\_DRMA  
**Email Number:** 1155

**Mail Envelope Properties** (SJ0PR09MB64156121DD1A60BA2315D7968D409)

**Subject:** ENERGY HARBOR FLEET, BEAVER VALLEY UNITS 1 AND 2 AND  
DAVIS-BESSE UNIT 1– ACCEPTANCE OF RELIEF REQUEST RE: PROPOSED ALTERNATIVE TO  
USE ASME OM CODE CASE OMN-27

**Sent Date:** 4/28/2021 2:17:38 PM  
**Received Date:** 4/28/2021 2:17:38 PM  
**From:** Vaidya, Bhalchandra

**Created By:** Bhalchandra.Vaidya@nrc.gov

**Recipients:**

"Farnan, Michael" <Michael.Farnan@nrc.gov>  
Tracking Status: None  
"Scarbrough, Thomas" <Thomas.Scarbrough@nrc.gov>  
Tracking Status: None  
"Buford, Angie" <Angela.Buford@nrc.gov>  
Tracking Status: None  
"Salgado, Nancy" <Nancy.Salgado@nrc.gov>  
Tracking Status: None  
"Kuntz, Robert" <Robert.Kuntz@nrc.gov>  
Tracking Status: None  
"Purnell, Blake" <Blake.Purnell@nrc.gov>  
Tracking Status: None  
"Tobin, Jennifer" <Jennifer.Tobin@nrc.gov>  
Tracking Status: None  
"Danna, James" <James.Danna@nrc.gov>  
Tracking Status: None  
"Wolfgang, Bob" <Robert.Wolfgang@nrc.gov>  
Tracking Status: None  
"Lashley, Phil H (EH)" <phlashley@energyharbor.com>  
Tracking Status: None

**Post Office:** SJ0PR09MB6415.namprd09.prod.outlook.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	4437	4/28/2021 2:17:38 PM

**Options**

**Priority:** Normal  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**