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

**Subject: Beaver Valley Power Station, Unit No. 1 and No. 2
BV-1 Docket No. 50-334, License No. DPR-66
BV-2 Docket No. 50-412, License No. NPF-73
ISI (Inservice Inspection) Program Relief Requests**

In accordance with 10 CFR 50.55a(a)(3), this submittal requests NRC review and approval of three proposed alternative requests applicable to the Ten-Year ISI Programs for BVPS Unit 1 and BVPS Unit 2.

Relief Request BV3-IWE1-2, Rev. 0; BV3-IWE1-3, Rev. 0; and BV3-IWL1-1, Rev. 0 are attached for your review. Relief Request BV3-IWE1-2 seeks relief from performing successive examinations after repairs are made. BV3-IWE1-3 requests relief from conducting bolt torque/tension testing. BV3-IWL1-1 requests relief from the minimum illumination and maximum distance requirements specified for visual examinations of concrete containments.

These relief requests are applicable to the initial interval of the Containment Inspection Program required by 10 CFR 50.55a(g)(6)(ii)(B).

If you have any questions regarding this submittal, please contact Mr. Mark S. Ackerman at (412) 393-5203.

Sincerely,


Lew W. Myers

Enclosures

c: Mr. D. S. Collins, Project Manager
Mr. D. M. Kern, Sr. Resident Inspector
Mr. H. J. Miller, NRC Region I Administrator

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Beaver Valley Power Station
Unit Nos. 1 and 2

RELIEF REQUEST NO. BV3-IWE1-2, Rev. 0

COMPONENTS

This relief request applies to all Class MC (Metallic Containment) components and metallic liners of Class CC (Concrete Containment) components.

ASME SECTION XI CODE REQUIREMENT

American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, 1992 Edition, 1992 Addenda, requires in Paragraph IWE-2420(b) that repairs of Class MC components are to be reexamined during the next inspection period. Paragraph IWE-2420(c) further requires that the repaired areas be examined in accordance with the augmented examination requirements of Examination Category E-C, for three consecutive periods.

RELIEF REQUESTED

Relief is requested from performing successive inspections of Class MC repairs in accordance with paragraphs IWE-2420(b) and (c).

BASIS FOR RELIEF

When a repair restores a component to an acceptable condition, successive examinations are not warranted. The requirements of Class 1, 2, or 3 Components in Paragraphs IWB-2420(b), IWC-2420(b), or IWD-2420(b) do not require a repair to be subjected to successive examinations. Thus, the successive examination requirement for repairs in accordance with IWE-2420(b) and (c) constitute a burden without a compensating increase in quality or safety. As stated in the NRC/NEI/EPRI meeting notes from H. Asher to G. Bagchi dated January 13, 1998 in Item 7, "The staff believes that the successive examinations are required to monitor the flaws or degradations accepted by engineering evaluation (and not by repair). For repaired flaws evaluated and accepted by the requirements of IWA-4000, the staff does not believe that successive examinations are necessary."

PROPOSED ALTERNATIVE

Repairs of Class MC Components will be performed in accordance with IWA-4000 without performing successive examinations in accordance with IWE-2420(b) and (c).

IMPLEMENTATION SCHEDULE

This relief request is applicable to the initial interval of the Containment Inspection Program.

Beaver Valley Power Station
Unit Nos. 1 and 2

RELIEF REQUEST NO. BV3-IWE1-3, Rev. 0

COMPONENTS

This relief request is applicable to the following Class MC components:

- Bolted connections on Containment Air Locks and Equipment Hatch
- Bolted connections on containment penetrations.

ASME SECTION XI CODE REQUIREMENTS

American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, 1992 Edition with the 1992 Addenda, Table IWE-2500-1, Examination Category E-G, Pressure Retaining Bolting, Item E8.20, requires bolt torque/tension testing on bolted connections that have not been disassembled and reassembled during the inspection interval, be subject to a torque/tension test once each interval to insure leak tight integrity.

REQUESTED RELIEF

Relief is requested from performing the torque/tension tests and to permit verification of leak tight integrity of bolted connections with the 10 CFR Part 50, Appendix J, Primary Containment Leakage Program.

BASIS FOR RELIEF

Performing a bolt torque/tension test requires that the bolted connection be retorqued or retensioned. This activity is considered maintenance and requires a 10 CFR Part 50, Appendix J, leak rate test upon completion of the activity. The performance of the 10 CFR Part 50, Appendix J test alone indicates the adequacy of the bolt torque or tension to maintain leakage within acceptable limits. Also, performance of Appendix J testing and visual inspection is adequate to demonstrate that the design function is met and verification of torque/tension is not required by other ASME B&PV Code, Section XI, Class 1, 2, or 3 pressure retaining bolted connections, as part of the inservice inspection program.

As stated in the NRC/NEI/EPRI meeting notes from H. Asher to G. Bagchi, dated January 13, 1998, in Item 8, "For the pressure-unseating bolted connections, it is necessary to confirm that the bolt's pretension is maintained. If their adequacy is verified during Appendix J testing, or during routine disassembling and reassembling, the staff believes that additional torque testing as per Table IWE-2500 (E8.20) is not needed."

PROPOSED ALTERNATE EXAMINATION

The leak tight integrity of bolted connections is verified by the 10 CFR Part 50, Appendix J, Primary Leakage Testing Program.

IMPLEMENTATION SCHEDULE

This relief request is applicable to the initial interval of the Containment Inspection Program.

Beaver Valley Power Station
Unit Nos. 1 and 2

RELIEF REQUEST NO. BV3-IWL1-1, Rev. 0

COMPONENTS

This request is applicable to the illumination and examination distance requirements for remote inspection of ASME Code Class CC concrete containments.

ASME SECTION XI CODE REQUIREMENT

ASME Section XI, 1992 Edition, 1992 Addenda, requires in Paragraphs IWL-2310 and IWA-2210, specific minimum illumination and maximum distance requirements for direct examination of all concrete containment surfaces.

REQUESTED RELIEF

Relief is requested from the specific minimum illumination and maximum distance requirements of IWL-2310 and IWA-2210 when performing examinations of Class CC concrete containments.

BASIS FOR REQUESTING RELIEF

Accessibility to higher elevations of the concrete containments makes it very difficult to obtain the specific minimum illumination and maximum distance requirements for direct examination of its surfaces. The installation of extensive scaffolding would be necessary and would provide only limited access due to restrictions and equipment interference. Installation and removal of the necessary scaffolding within certain buildings or areas would increase personnel radiation exposure and further risk personnel safety.

The NRC recognized the difficulty of obtaining the minimum illumination and maximum distance requirements for steel containment structures by providing an alternative in 10 CFR 50.55a(b)(2)(x)(B) which states, "When performing remotely the visual examinations required by Subsection IWE, the maximum direct examination distance specified in Table IWA-2210-1 may be extended and the minimum illumination requirements specified in Table IWA-2210-1 may be decreased provided that the conditions or indications for which the visual examination is performed can be detected at the chosen distance and illumination."

PROPOSED ALTERNATIVE

As permitted for metal containments, the minimum illumination and maximum examination distances for remote visual examination of the concrete containments will be controlled so that the conditions or indications for which the visual examinations are performed can be detected.

IMPLEMENTATION SCHEDULE

This relief request is applicable to the initial interval of the Containment Inspection Program.