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Senior Vice President

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L-00-028

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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 Request**

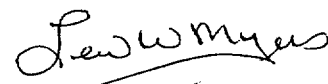
In accordance with 10 CFR 50.55a(a)(3), this submittal requests NRC review and approval of a proposed revised alternative request applicable to the Ten-Year ISI Programs for BVPS Unit 1 and BVPS Unit 2.

Relief Request BV3-IWL1-1, Revision 1 is attached for your review. BV3-IWL1-1 requests relief from the minimum illumination and maximum distance requirements specified for visual examinations of concrete containments.

This relief request is 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

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

Mary E. O'Reilly  
FirstEnergy Legal Department

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Beaver Valley Power Station  
Unit Nos. 1 and 2

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

**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 has already 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." This proposed alternative for concrete containment examinations is similar to that already permitted for steel containment structures.

**PROPOSED ALTERNATIVE**

In lieu of using the Table IWA-2210-1 test chart characters, the Responsible Engineer will determine the resolution required to ensure indications of interest are detectable. The Responsible Engineer will also identify the minimum size for indications of interest. For remote visual examination, the examination method will be demonstrated capable of resolving these minimum indications to the satisfaction of the Responsible Engineer and the ANII.

**IMPLEMENTATION SCHEDULE**

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