

October 24, 2009

Mr. Theodore Robinson, Esq. and
Mr. David Hughes, Executive Director
Citizen Power
2121 Murray Avenue
Pittsburgh, PA 15217

Dear Mr. Robinson and Mr. Hughes:

On behalf of the U.S. Nuclear Regulatory Commission (NRC or the staff), I am responding to your letters dated July 1, 2009, (Agencywide Documents Access and Management System Accession Number ML091910134), July 7, 2009 (ML091900719), and August 27, 2009 (ML092460728), expressing your concern regarding the ability of the FirstEnergy Nuclear Operating Company (FENOC) inspection program to identify corrosion of the containment liner that originates from the outside surface of the liner.

The staff considers the degradation of the containment liner plate an important issue since the liner plate in conjunction with the concrete behind the liner provides an essentially leak tight pressure barrier during all postulated accident conditions. Following the identification of liner corrosion in April 2009 the applicant replaced the affected area containing the defect in accordance with the requirements of the code used for construction of the containment liner. The NRC license renewal staff issued a request for additional information (ML091260025) on May 7, 2009, to verify that FENOC would incorporate the recent plant-specific operating experience related to the liner degradation into its American Society of Mechanical Engineers Section XI, Subsection IWE aging management program. Since that time, NRC staff has had several conference calls and requested additional information about FENOC's proposed corrective actions that will be implemented to address the Beaver Valley Power Station (BVPS), Unit 1, liner plate degradation.

The staff's evaluation of FENOC's proposed corrective actions, including the visual and volumetric examination, is addressed in "Safety Evaluation Report Related to the License Renewal of the Beaver Valley Power Station, Units 1 and 2," which was issued on June 8, 2009 (ML091600216). In addition, the staff has issued Supplement 1 to the BVPS, Units 1 and 2, Safety Evaluation Report (SER), dated October 6, 2009 (ML092520531), which evaluates supplemental information provided by FENOC related to their liner inspection program. Based on the staff's evaluation described in the supplement to the SER, the staff has concluded that the commitments made by the applicant for the visual and volumetric examinations of the liner plate are acceptable and provide reasonable assurance that the containment liner plate at BVPS, Units 1 and 2, will continue to remain functional during the period of extended operation. A copy of the SER supplement (Enclosure 1) is attached for your information. The NRC staff has also prepared a response to the specific issues identified in your letters (Enclosure 2).

T. Robinson, et al.

- 2 -

Thank you for your comments. I understand that the Division of License Renewal staff highlighted your organization's comments at the recent Advisory Committee on Reactor Safeguards (ACRS) meeting (in particular, your comment which the staff incorporated into the SER regarding utilizing random sampling only to verify a 95/95 confidence level). It is also important to note that the NRC staff will brief the ACRS on the impact of the containment liner corrosion on the current licensing basis of the plant in a future meeting. If you should have additional questions regarding the recently issued Supplement 1 to the BVPS, Units 1 and 2, license renewal SER, please contact Mr. Brian E. Holian, Director of the Division of License Renewal by telephone at 301-415-1183.

Sincerely,

/RA/

Eric J. Leeds, Director
Office of Nuclear Reactor Regulation

Enclosures:

1. Supplement 1 to the Beaver Valley Power Station, Units 1 and 2, Safety Evaluation Report
2. Response to the Questions in Citizen Power's August 27, 2009 Letter

cc: Mr. Mike Banko
Listserv

Thank you for your comments. I understand that the Division of License Renewal staff highlighted your organization's comments at the recent Advisory Committee on Reactor Safeguards (ACRS) meeting (in particular, your comment which the staff incorporated into the SER regarding utilizing random sampling only to verify a 95/95 confidence level). It is also important to note that the NRC staff will brief the ACRS on the impact of the containment liner corrosion on the current licensing basis of the plant in a future meeting. If you should have additional questions regarding the recently issued Supplement 1 to the BVPS, Units 1 and 2, license renewal SER, please contact Mr. Brian E. Holian, Director of the Division of License Renewal by telephone at 301-415-1183.

Sincerely,

/RA/

Eric J. Leeds, Director
Office of Nuclear Reactor Regulation

Enclosures:

1. Supplement 1 to the Beaver Valley Power Station, Units 1 and 2, Safety Evaluation Report
2. Response to the Questions in Citizen Power's August 27, 2009 Letter

cc: Mr. Mike Banko
Listserv

DISTRIBUTION: G20090544/EDATS: OEDO-2009-0574
G20090418/EDATS: OEDO-2009-0458

See next page

ADAMS Accession Nos.: **ML092230728** (Package) **ML092040512** (G20090418 Incoming)
ML092670471 (G20090544 Incoming) **ML092180715** (Response)
ML092570014 (Enclosure 1) **ML092930500** (Enclosure 2)
*concurrent via e-mail

OFFICE	PM:RPB2:DLR	LA:DLR	BC:RPB2:DLR	BC:DRS:RI
NAME	KHoward	SFigueroa	DWrona	RConte*
DATE	10/19/09	10/19/09	10/19/09	10/14/09
OFFICE	OGC	D:NRR:DLR	D:NRR	
NAME	LSubin	BHolian(SLee for)	ELeeds	
DATE	10/19/09	10/19/09	10/24/09	

OFFICIAL RECORD COPY

Letter to Theodore Robinson, et al. from Eric J. Leeds dated October 24, 2009

DISTRIBUTION: G20090544/EDATS: OEDO-2009-0574
G20090418/EDATS: OEDO-2009-0458

HARD COPY:

DLR RF

E-MAIL:

PUBLIC

RidsNrrDlr Resource
RidsNrrDlrRpb1 Resource
RidsNrrDlrRpb2 Resource
RidsNrrDlrRer1 Resource
RidsNrrDlrRer2 Resource
RidsNrrDlrRerb Resource
RidsNrrDlrRpob Resource
RidsNrrDciCvib Resource
RidsNrrDciCpnb Resource
RidsNrrDciCsgb Resource
RidsNrrDraAfpb Resource
RidsNrrDraApla Resource
RidsNrrDeEmcb Resource
RidsNrrDeEeeb Resource
RidsNrrDssSrxb Resource
RidsNrrDssSbpb Resource
RidsNrrDssScvb Resource
RidsOgcMailCenter Resource
RidsAcrcACNW_MailCTR Resource
RidsEdoMailCenter Resource
RidsNrrMailCenter Resource
RidsNrrOd Resource
RidsNrrAdes Resource
RidsNrrAdro Resource
RidsNroOd Resource
RidsResOd Resource
RidsRgn1MailCenter Resource

KHoward
NMorgan
MModes, RI
PCataldo, RI
DVerkheiser, RI

REFERENCES

1. Oak Ridge National Laboratory Report, ORNL/TM-2005/520, "Final Report Inspection of Aged/Degraded Containments Program."
2. Electric Power Research Institute (EPRI) Report TR-107514, "Age Related Degradation Inspection Method and Determination."

Beaver Valley Power Station
Units 1 and 2

cc:

Mr. Joseph J. Hagan
President and Chief Nuclear Officer
FirstEnergy Nuclear Operating Company
Mail Stop A-GO-19
76 South Main Street
Akron, OH 44308

Mr. James H. Lash
Senior Vice President of Operations
and Chief Operating Officer
FirstEnergy Nuclear Operating Company
Mail Stop A-GO-14
76 South Main Street
Akron, OH 44308

Mr. Danny L. Pace
Senior Vice President, Fleet Engineering
FirstEnergy Nuclear Operating Company
Mail Stop A-GO-14
76 South Main Street
Akron, OH 44308

Ms. Jeannie M. Rinckel
Vice President, Fleet Oversight
FirstEnergy Nuclear Operating Company
Mail Stop A-GO-14
76 South Main Street
Akron, OH 44308

Mr. Paul A. Harden
Vice President, Nuclear Support
FirstEnergy Nuclear Operating Company
Mail Stop A-GO-14
76 South Main Street
Akron, OH 44308

Mr. David W. Jenkins, Attorney
FirstEnergy Corporation
Mail Stop A-GO-15
76 South Main Street
Akron, OH 44308

Manager, Fleet Licensing
FirstEnergy Nuclear Operating Company
Mail Stop A-GO-2
76 South Main Street
Akron, OH 44308

Director, Fleet Regulatory Affairs
FirstEnergy Nuclear Operating Company
Mail Stop A-GO-2
76 South Main Street
Akron, OH 44308

Manager, Site Regulatory Compliance
FirstEnergy Nuclear Operating Company
Beaver Valley Power Station
Mail Stop A-BV-A
P.O. Box 4, Route 168
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
P.O. Box 298
Shippingport, PA 15077

Mr. Cliff Custer
FirstEnergy Nuclear Operating Company
Beaver Valley Power Station
P.O. Box 4, Route 168
Shippingport, PA 15077

Mr. Steve Dort
FirstEnergy Nuclear Operating Company
Beaver Valley Power Station
P.O. Box 4, Route 168
Shippingport, PA 15077

Beaver Valley Power Station
Units 1 and 2

- 2 -

cc:

Mr. Mike Banko
FirstEnergy Nuclear Operating Company
Beaver Valley Power Station
P.O. Box 4, Route 168
Shippingport, PA 15077