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10 CFR 50.55a

June 27, 2001

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: Limerick Generating Station, Units 1 and 2
Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353
Second Ten-Year Interval Inservice Inspection (ISI) Program

- References:
- 1) Letter from J. A. Hutton (PECO Energy Company) to U.S. Nuclear Regulatory Commission (USNRC), dated January 9, 2001
 - 2) Letter from C. Gratton (USNRC) to J. A. Hutton (Exelon Generation Company, LLC), dated May 4, 2001
 - 3) Letter from J. A. Hutton (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission (USNRC), dated May 15, 2001
 - 4) Letter from J. A. Hutton (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission (USNRC), dated May 23, 2001


Dear Sir/Madam:

In the Reference 1 letter, Exelon Generation Company, LLC, submitted proposed relief requests and alternatives for review and approval concerning the update of the Second Ten-Year Interval Inservice Inspection (ISI) Program for Limerick Generating Station (LGS), Units 1 and 2. References 2, 3, and 4 concern additional information requested by the U. S. Nuclear Regulatory Commission for these proposed relief requests and alternatives.

Attached for your review and approval is an additional proposed alternative concerning snubber inspections.

If you have any questions, please contact us.

Very truly yours,


James A. Hutton
Director-Licensing

cc: H. J. Miller, Administrator, Region I, USNRC
A. L. Burritt, USNRC Senior Resident Inspector, LGS
C. Gratton, Senior Project Manager, USNRC

A047.

RELIEF REQUEST No. RR-04
Revision 2

I. IDENTIFICATION OF COMPONENTS

ASME Class 1, 2, and 3 snubber assemblies, Code Examination Category F-A, Item Numbers F1.10 through F1.40.

This relief is applicable to the snubber assembly only, which includes the snubber body and attachments out to and including the load pins and their retainers.

II. CODE REQUIREMENTS FROM WHICH AN ALTERNATIVE IS REQUESTED

The 1989 Edition of ASME, Section XI, Subsection IWF provides requirements for the inspection and testing of Class 1, 2, 3, and MC component supports. Article IWF-2000 provides the examination rules for component supports. They are summarized in Table IWF-2500-1, Examination Category F-A, which specifies VT-3 visual examination of supports each inspection interval.

Article IWF-5000 provides the inservice inspection requirements for snubbers. Paragraph IWF-5300(a) specifies that inservice examinations shall be performed in accordance with the first Addenda to ASME/ANSI OM-1987, Part 4 (published in 1988) using the VT-3 visual examination method in IWA-2213. IWF-5300(b) specifies that inservice tests shall be performed in accordance with the first Addenda to ASME/ANSI OM-1987, Part 4 (published in 1988).

Pursuant to 10CFR50.55a(a)(3)(i), an alternative is requested to perform snubber examinations and tests in accordance with the requirements of LGS, Units 1 and 2 Technical Specifications (TS) 3/4.7.4 on the basis that the proposed alternative provides an acceptable level of quality and safety.

III. BASIS FOR ALTERNATIVE

Limerick Generating Station (LGS), Units 1 and 2, Technical Specifications (TS) 3/4.7.4 establish the surveillance requirements for snubbers. The TS snubber visual examination program requires a sample size of all safety related snubbers and incorporates the alternate snubber visual examination requirements delineated in USNRC Generic Letter (GL) 90-09, "Alternate Requirements for Snubber Visual Inspection Intervals and Corrective Actions." The TS functional testing program is based on the ASME /ANSI OM-1990 Addenda to ASME/ANSI OM-1987, Part 4, "Examination and Performance Testing of Nuclear Power Plant Dynamic Restraints (Snubbers)".

Relief Request No. RR-04
Revision 2, continued

The purpose of the Augmented Inservice Inspection Program described in the LGS, Units 1 and 2 TS 3/4.7.4 is to assure and demonstrate operational readiness and structural integrity of snubbers through testing and examination. The examination criteria for snubbers from pin-connection to pin-connection meet this objective. Therefore, performance of the ASME, Section XI, examinations on snubber assemblies would be redundant.

Limerick Generating Station, Units 1 and 2, has procedures in place to implement the program as described in the Technical Specifications 3/4.7.4. The examinations are performed by qualified personnel and meet the intent of the inspections and tests of ASME Section XI. Based on the above discussion, LGS has determined that implementation of Technical Specifications 3/4.7.4 for both Units 1 and 2 will assure an acceptable level of quality and safety.

IV. ALTERNATE PROVISIONS

The examination and functional testing of snubber assemblies from pin-connection to pin-connection at Limerick Generating Station, Unit 1 and 2, will be performed in accordance with Technical Specifications 3/4.7.4. These examinations will be performed in lieu of the inspection and testing requirements of IWF-2000 and IWF-5000. The general requirements of Subsection IWA, such as examination methods, personnel qualifications, etc., still apply.