

October 26, 2001

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

Limerick Generating Station, Units 1 and 2
Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

Subject: 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 O. D. Kingsley (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
 - 5) Letter from J. A. Hutton (Exelon Generation Company, LLC) to U. S. Nuclear Regulatory Commission (USNRC), dated June 27, 2001
 - 6) Letter from M. P. Gallagher (Exelon Generation Company, LLC) to U. S. Nuclear Regulatory Commission (USNRC), dated August 16, 2001
 - 7) Letter from J. W. Clifford (USNRC) to O. D. Kingsley (Exelon Generation Company, LLC), dated September 12, 2001
 - 8) Letter from M. P. Gallagher (Exelon Generation Company, LLC) to U. S. Nuclear Regulatory Commission (USNRC), dated September 20, 2001

Dear Sir/Madam:

In the Reference 1 letter, PECO Energy Company (now 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. As a result of a telephone conversation between the U. S. Nuclear Regulatory Commission and Exelon Generation Company, LLC, on October 17,

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2001, attached are responses to questions discussed during this conversation concerning the snubber relief request (Relief Request RR-04).

If you have any questions, please contact us.

Very truly yours,



Michael P. Gallagher
Director, Licensing and Regulatory Affairs
Mid-Atlantic Regional Operating Group

Attachment

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

ATTACHMENT
RESPONSE TO QUESTIONS
CONCERNING SECOND TEN-YEAR INTERVAL
INSERVICE INSPECTION (ISI) PROGRAM

General Information

Relief Request No. RR-04, Revision 1, was previously approved by the NRC for use at Limerick Generating Station, Units 1 and 2, for the first 10-year inspection interval per the following safety evaluations:

- (1) Letter from C. L. Miller (NRC) to G. A. Hunger, Jr. (Philadelphia Electric Company), dated March 1, 1994.
- (2) Letter from W. R. Butler (NRC) to G. J. Beck (Philadelphia Electric Company), dated April 23, 1991.

The Technical Specification Change Request letter and Safety Evaluation for the use of the ASME/ANSI OM-1990 Addenda to the ASME/ANSI OM-1987, Part 4, are listed below:

- (3) Letter from G. J. Beck (Philadelphia Electric Company) to U. S. Nuclear Regulatory Commission (NRC), dated March 3, 1992.
- (4) Letter from R. J. Clark (NRC) to G. J. Beck (Philadelphia Electric Company), dated May 11, 1992.

Question 1:

"In the letter dated June 27, 2001, the licensee identified the components covered in RR-04 to be ASME Class 1, 2, and 3 snubber assemblies, Code Examination Category F-A, Item Numbers F1.10 through F1.40. The staff noted that these item numbers are referenced in Table IWF-2500-1 of ASME Code, Section XI, 1989 Edition, 1990 Addenda through the later editions and addenda. The staff also noted that a different set of item numbers is referenced in Table IWF-2500-1 of ASME Code, Section XI, 1989 Edition (with no Addenda). Verify the applicable addenda of Section XI of the ASME Code for the Limerick second ten-year Inservice Inspection (ISI) Interval."

Response 1:

The Limerick second 10-year Inservice Inspection (ISI) interval is based on the 1989 Edition, no Addenda, of the ASME Code. The Code Examination Category F-A, Item Numbers F1.10 through F1.40 are assigned from Code Case N-491-1 for Class 1, 2 and 3 supports only as a means to provide consistency within the ISI Program. The extent of our use of Code Case N-491-1 for snubber assemblies is limited to the assignment of Item Numbers. A paragraph will be inserted in Section I of the relief request to reference Code Case N-491-1. The paragraph shall read:

"For consistency with the rest of the Inservice Inspection Program, Category and Item Numbers were assigned to Class 1, 2 and 3 snubbers in accordance with Code Case N-491-1. The extent of use of Code Case N-491-1 on the snubber assembly is limited to the assignment of Item Numbers."

The revised relief request is attached.

Question 2:

"The licensee stated that examinations are to be performed by qualified personnel. Discuss in detail the plant procedure of qualifying personnel to perform the examination and how the procedure and the personnel qualification meet the VT-3 examination requirements of ASME Code, Section XI."

Response 2:

Examination personnel are qualified as Level II inspectors as defined in Section XI of the ASME Code, IWA-2300. Examination personnel are qualified by examination and are certified in accordance with SNT-TC-1A as required by IWA-2300. Level II personnel are currently recertified by qualification examinations every three (3) years. VT-3 examiners complete additional site-specific training prior to each inspection. The completion of the site-specific training ("Snubber Visual Inspection Orientation Program") is documented per applicable Exelon procedures.

Question 3:

"Discuss in detail how the proposed examination requirements of Technical Specifications 3/4.7.4 will meet the inspection requirements of ASME Code Section XI, Subsection IWF-5000, for the snubber assembly, which includes the snubber body and attachments out to and including the load pins and their retainers."

Response 3:

ASME Code Section XI, Subsection IWF-5000 requires functional testing of snubbers to be in accordance with the first Addenda to ASME/ANSI OM-1987, Part 4 (published in 1988). In a letter to the NRC, dated March 3, 1992, Philadelphia Electric Company (now Exelon Generation Company, LLC) requested that the snubber functional testing Technical Specification (TS) Surveillance Requirements (SRs) and pertinent Bases be revised to incorporate the most recent recommendations contained in the American Society of Mechanical Engineers (ASME) Operations and Maintenance (OM) standard for snubber testing, ASME/ANSI OM-1990 Addenda to ASME/ANSI OM-1987, Part 4, "Examination and Performance Testing of Nuclear Power Plant Dynamic Restraints (Snubbers)." Technical Specification Change Request No. 91-04-0 was approved for LGS, Units 1 and 2. Technical Specification 3/4.7.4 requires functional testing of snubbers as set forth in the approved Safety Evaluation for the Technical Specification Change (Letter from R. J. Clark (NRC) to G. J. Beck (Philadelphia Electric Company), dated May 11, 1992). The requirements set forth in LGS Technical Specification 3/4.7.4 provide an approved set of requirements, comparable to ASME Code Section XI, Subsection IWF-5000.

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.

For consistency with the rest of the Inservice Inspection Program, Category and Item Numbers were assigned to Class 1, 2 and 3 snubbers in accordance with Code Case N-491-1. The extent of use of Code Case N-491-1 on the snubber assembly is limited to the assignment of Item Numbers.

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)."

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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.