

10 CFR 50.55a

January 10, 2003

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

Peach Bottom Atomic Power Station, Units 2 and 3
Facility Operating License Nos. DPR-44 and DPR-56
Docket Nos. 50-277 and 50-278

Subject: Proposed Alternative Associated with the Risk-Informed Inservice
Inspection Program

- References:
- 1) Letter from M. P. Gallagher (Exelon Generation Company, LLC) to U. S. Nuclear Regulatory Commission, March 15, 2002
 - 2) Letter from S. P. Wall (U. S. Nuclear Regulatory Commission) to J. L. Skolds (Exelon Generation Company, LLC), dated September 10, 2002
 - 3) Letter from M. P. Gallagher (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, October 16, 2002
 - 4) Letter from M. P. Gallagher (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, June 25, 2002

Dear Sir/Madam:

In the Reference 1 and 4 letters, Exelon Generation Company (Exelon), LLC submitted proposed alternatives to the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," requirements for the selection and examination of Class 1 and 2 piping welds for Limerick Generating Station (LGS), Units 1 and 2, and Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, respectively. The alternatives proposed by LGS and PBAPS use methodology for a Risk-Informed Inservice Inspection (RISI) program approved by the U. S. Nuclear Regulatory Commission (NRC).

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In the Reference 1 and 4 letters, we state that:

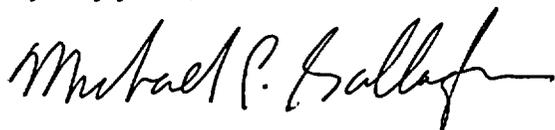
"If the additional required examinations reveal flaws or relevant conditions exceeding the referenced acceptance standards, the examination shall be further extended to include additional examinations.

- (1) These examinations shall include all remaining piping elements whose postulated failure modes are the same as the piping structural elements originally examined.
- (2) An evaluation shall be performed to establish when those examinations are to be conducted. The evaluation must consider failure mode and potential."

Exelon will eliminate the requirement contained in item 2 with regards to performing an evaluation to establish when additional examinations are to be conducted. In lieu of item 2, Exelon will consider all R-A category welds as ASME Class 1, and will follow the provisions of the 1989 ASME Section XI Code, IWB-2430(b), with regards to the second sample expansion. The required additional examinations will be performed during the same outage that the relevant condition was detected.

If you have any questions, please contact us.

Very truly yours,



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

cc: H. J. Miller, Administrator, Region I, USNRC
A. L. Burritt, USNRC Senior Resident Inspector, LGS
S. P. Wall, Project Manager, USNRC
A. C. McMurtray, USNRC Senior Resident Inspector, PBAPS
J. P. Boska, Senior Project Manager, USNRC