

March 6, 2003

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555Limerick Generating Station, Units 1 and 2
Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353Subject: Implementation of the Performance Demonstration Methods Supplement Ten
(10) – “Qualification Requirements for Dissimilar Metal Piping Welds”Reference: 1) Letter from M. P. Gallagher (Exelon Generation Company, LLC) to U. S.
Nuclear Regulatory Commission, dated December 13, 20022) Letter from M. P. Gallagher (Exelon Generation Company, LLC) to U. S.
Nuclear Regulatory Commission, dated February 14, 2003

Dear Sir/Madam:

In the referenced letters, Exelon Generation Company (Exelon), LLC requested approval of a proposed alternative concerning performance demonstration methods for ultrasonic examination systems for Limerick Generating Station (LGS), Units 1 and 2. Specifically, this proposed alternative concerns dissimilar metal piping welds as implemented by Supplement 10.

In response to our request, a conference call was held on Thursday, March 6, 2003. The following is our response to questions discussed in this call:

Question:

1. The proposed alternative is to qualify personnel and procedures for depth sizing using an acceptance criterion of 0.155 root mean square (RMS) error. The submittal states that the error will be considered during fracture mechanics calculations. Explain the application of the acceptance error with respect to fracture mechanics calculations. Provide an example if appropriate.

Response:

For the purposes of flaw evaluation, Exelon would use the difference between the RMS error of 0.155 (i.e., the value currently achieved by the vendor) and the value required by the Code (0.125 RMS) to increase the flaw depth.

Question:

2. The EPRI-Performance Demonstration Initiative program has used 0.125 RMS as the depth sizing error for piping. The industry is currently having difficulty qualifying personnel and procedures to a 0.125 RMS error for dissimilar metal welds. However, UT techniques are being

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developed with the goal of achieving the 0.125 RMS error criterion. Explain Limerick's approach for incorporating reductions in the RMS error for future examinations.

Response:

Exelon is requesting review of the December 13, 2002 (Reference 1) letter as submitted for LGS, Units 1 and 2 for the full interval. In addition, we are requesting review of the 0.155 RMS value for LGS, Unit 2. Exelon requests that this relief be in effect for 18 months for LGS, Unit 2. If at that time, the 0.125 RMS value is not achievable, Exelon will re-apply for relief. The 18 month duration will allow industry vendors to explore and enhance technology towards reaching the Code goal of 0.125 RMS.

Exelon withdraws the request for relief for the 0.155 RMS value for LGS, Unit 1, which was requested in the February 14, 2003 letter (Reference 2).

If you have any questions, please contact us.

Very truly yours,



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

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