

Nuclear

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An Exelon/British Energy Company

10 CFR 50.55a

March 26, 2003

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

> Clinton Power Station Facility Operating License No. NPF-62 NRC Docket No. 50-461

> Dresden Nuclear Power Station, Unit 2 Facility Operating License No. DPR-25 NRC Docket No. 50-249

> LaSalle County Station, Unit 1 Facility Operating License No. NPF-11 NRC Docket No. 50-373

Peach Bottom Atomic Power Station, Unit 3 Facility Operating License No. DPR-56 NRC Docket No. 50-278

Quad Cities Nuclear Power Station, Unit 2 Facility Operating License No. DPR-29 NRC Docket No. 50-254

- Subject: 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 March 26, 2003.

## Dear Sir/Madam:

In the referenced letter, Exelon Generation Company (Exelon), LLC and AmerGen Energy Company (AmerGen), LLC, requested approval of a proposed alternative concerning performance demonstration methods for ultrasonic examination systems. Specifically, this proposed alternative concerns dissimilar metal piping welds as implemented by Supplement 10.

As discussed in the referenced letter, additional relief regarding the RMS value for crack depth sizing would be addressed in separate correspondence. Accordingly, personnel qualifying to the Supplement 10 procedures were not capable of being qualified to an overall error less than or

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equal to a 0.125" RMS for crack depth sizing capability for the plants listed above. Further review by the PDI Technical Working Group has determined that an error of up to 0.155" RMS should be considered during fracture mechanics calculations utilizing depth-sizing measurements obtained with the Supplement 10 procedure. Therefore, Exelon and AmerGen requests use of this 0.155 RMS value for the plants identified above.

For the purposes of flaw evaluation, Exelon and AmerGen 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.

Exelon requests that this relief be in effect for 18 months. If after time, the 0.125 RMS value is not achievable, Exelon and AmerGen 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.

If you have any questions, please contact us.

Very truly yours,

Michael P. Gallagher Director, Licensing and Regulatory Affairs Exelon Nuclear Exelon Generation Company, LLC

Michael P. Gallagher Director, Licensing and Regulatory Affairs AmerGen Energy Company, LLC

cc: Regional Administrator – NRC Region I Regional Administrator – NRC Region III NRC Senior Resident Inspector – Dresden Nuclear Power Station NRC Senior Resident Inspector – LaSalle County Station NRC Senior Resident Inspector – Peach Bottom Atomic Power Station NRC Senior Resident Inspector – Quad Cities Nuclear Power Station NRC Senior Resident Inspector – Clinton Power Station

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