March 3, 2008

Mr. Charles G. Pardee
Chief Nuclear Officer and Senior Vice President
Exelon Generation Company, LLC
200 Exelon Way
Kennett Square, PA 19348

SUBJECT: PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3 RELIEF REQUESTS ASSOCIATED WITH THE FOURTH INSERVICE TESTING INTERVAL (TAC NOS. MD7461 AND MD7462)

Dear Mr. Pardee:

By letter to the Nuclear Regulatory Commission (NRC) dated November 28, 2007 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML073330605), Exelon Generation Company, LLC (the licensee), submitted Relief Requests associated with the fourth inservice testing interval for Peach Bottom Atomic Power Station, Units 2 and 3. The NRC staff has reviewed the request submitted by the licensee and has identified a need for additional information as set forth in the Enclosure.

The draft questions were sent to Tom Loomis, from your staff, to ensure that the questions were understandable, the regulatory basis for the questions was clear, and to determine if the information was previously docketed. On February 13, 2008, Mr. Loomis indicated that the licensee will submit a response by March 19, 2008. Please note that if you do not respond to this letter by the agreed-upon date or provide an acceptable alternate date in writing, we may reject your application for amendment under the provisions of Title 10 of the *Code of Federal Regulations*, Section 2.108. If you have any questions, please contact John Hughey at (301) 415-3204.

Sincerely,

/ra/

John D. Hughey, Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-277 and 50-278

cc: See next page

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OFFICIAL RECORD COPY

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REQUEST FOR ADDITIONAL INFORMATION

REGARDING REQUESTS FOR RELIEF ASSOCIATED

WITH THE FOURTH INSERVICE TESTING INTERVAL

PEACH BOTTOM ATOMIC POWER STATION, UNITS NO. 2 AND 3

DOCKET NOS. 50-277 AND 50-278

By letter dated November 28, 2007, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML073330605), Exelon Generation Company, LLC, submitted Relief Requests associated with the Fourth Inservice Testing Interval for Peach Bottom Atomic Power Station, Unit Nos. 2 and 3. The Nuclear Regulatory Commission (NRC) staff has reviewed the requests for relief the licensee provided in the November 28, 2007, submittal. In order for the NRC staff to complete its evaluation, response to the following requests for additional information (RAI) questions is requested.

RAIs Regarding Relief Request 01A-VRR-1:

RAI-01.1) Relief from an American Society of Mechanical Engineers Operation and Maintenance (ASME OM) Code relief valve 5-year setpoint test requirement is requested in accordance with Title 10 of the *Code of Federal Regulations*, Part 50, (10 CFR Part 50) Section 50.55a(a)(3)(ii). Explain why compliance with this requirement would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

RAI-01.2) Explain why safety relief valve S/N 73 was not tested during the September 2007 Unit 3 refueling outage.

RAIs Regarding Relief Request 01A-VRR-2:

RAI-02) Describe how proper installation of the electrical and air line connections to each pilot valve is verified following installation of the pilot and main valve assembly in the unit.

RAIs Regarding Relief Request GVRR-1:

RAI-03.1) Clarify the specific requirements in the ASME OM Code for which relief is requested.

RAI-03.2) Identify the differences between the version of OMN-1 in the 2006 Addenda of the ASME OM Code and the version of OMN-1 conditionally approved in Regulatory Guide (RG) 1.192, “Operation and Maintenance Code Case Acceptability, ASME OM Code.” Discuss if the conditions for use of OMN-1 listed in RG 1.192 are applicable to the version of OMN-1 in the 2006 Addenda of the ASME OM Code.

Enclosure

RAI-03.3) Relief Request GVRR-1 is requested pursuant to 10 CFR 50.55a(a)(3)(i) based on an alternative providing an acceptable level of quality and safety. However, GVRR-1 includes an exception to the ASME OMb Code-2006, OMN-1, Rev. 1, Section 3.6.1 which cites only hardship as a basis for relief. Describe how the proposed alternative provides an acceptable level of quality and safety. Include in this description an explanation of why the separation of oil and grease in a motor operated valve (MOV) actuator is not an issue for periods that exceed 24 months between cycling. Identify the approximately 20 MOVs to which this exception would apply and specifically explain why each MOV cannot be cycled every 24 months.

RAIs Regarding Relief Request GVRR-2:

RAI-04) Clarify the specific requirements in ASME OM Code ISTC-3522, ISTC-5221, ISTC-5222, and ISTC-5223 that relief is being requested and why relief is needed for each requirement.