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U.S. Nuclear Regulatory Commission
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Peach Bottom Atomic Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277 and 50-278

Subject: Response to Request for Additional Information Regarding Generic Letter 2008-01

References:

1. NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," dated January 11, 2008
2. Letter from K. R. Jury (Exelon Generation Company, LLC/AmerGen Energy Company, LLC) to U.S. NRC, "Three Month Response to Generic Letter 2008-01," dated April 11, 2008
3. Letter from K. R. Jury (Exelon Generation Company, LLC/AmerGen Energy Company, LLC) to U.S. NRC, "Nine-Month Response to Generic Letter 2008-01," dated October 14, 2008
4. Letter from P. R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Supplemental Response to Generic Letter 2008-01," dated January 16, 2009
5. Letter from J. D. Hughey (U.S. NRC) to C. G. Pardee (Exelon Generation Company, LLC), "Peach Bottom Atomic Power Station, Units 2 and 3 – Request for Additional Information Regarding Generic Letter 2008-01, 9-Month Response (TAC Nos. MD7860 and MD7861)," dated September 14, 2009

The NRC issued Generic Letter (GL) 2008-01 (i.e., Reference 1) to request that each licensee evaluate the licensing basis, design, testing, and corrective action programs for the Emergency Core Cooling, Decay Heat Removal, and Containment Spray systems, to ensure that gas

accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified.

References 2, 3, and 4 provided the Exelon Generation Company, LLC (EGC) responses to NRC GL 2008-01 for Peach Bottom Atomic Power Station. In Reference 5, the NRC requested additional information that is required to complete the review. In response to this request, EGC is providing the attached information.

There are no regulatory commitments contained in this letter. Should you have any questions concerning this letter, please contact Mr. Kenneth M. Nicely at (630) 657-2803.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 10th day of November 2009.

Respectfully,

Patrick R. Simpson
Manager – Licensing

Attachment: Response to Request for Additional Information

cc: NRC Regional Administrator – Region I
Senior Resident Inspector – Peach Bottom Atomic Power Station

ATTACHMENT
Response to Request for Additional Information

NRC Request 1: Subject Systems

Exelon Generation Company (EGC or the licensee) has developed a list of Peach Bottom Atomic Power Station (PBAPS)-specific systems considered to be within the scope of the Generic Letter (GL) 2008-01 requested actions. One component of the list is the Residual Heat Removal (RHR) system; however, as a multi-function system, it has many functions.

RAI 1.1 Clarify specifically which RHR functions and subsystems are within the scope of the GL 2008-01 review.

RAI 1.2 Identify specifically any RHR functions or subsystems that were excluded from the GL2008-01 review for PBAPS.

RAI 1.1 Response

The RHR system is comprised of two redundant, independent loops, each consisting of two motor driven pumps, two heat exchangers, and associated piping and valves which are arranged for parallel operation to support three major operating modes (i.e., Low Pressure Coolant Injection (LPCI), Containment Cooling, and Shutdown Cooling).

During normal plant conditions, the system has the following functions:

- Provides shutdown cooling function to remove decay heat and sensible heat from the reactor primary system following depressurization of the reactor;
- Provides suppression pool cooling function to maintain the suppression pool water temperature within the design limits; and
- Provides supplemental cooling capacity to assist the Fuel Pool Cooling and Cleanup (FPCC) system in removing excessive heat from the spent fuel.

During postulated loss-of-coolant accident (LOCA) conditions, the system has the following functions:

- Operates in conjunction with other Emergency Core Cooling Systems (ECCS) after the accident to provide the required core cooling by restoring and maintaining, if necessary, the water level in the reactor vessel;
- Provides containment spray and suppression pool cooling to maintain the containment pressure and temperature within the design pressure and temperature limits of the containment; and
- Provides an injection flow path for the discharge of raw water from the High Pressure Service Water system into the reactor vessel under a condition postulated in the emergency operating procedures involving a loss of ECCS pumps due to loss of containment pressure two hours after an accident.

During non-design basis modes, the system has the following functions:

- Provides shutdown heating function to increase and maintain the reactor vessel flange temperature above 70°F after tensioning the vessel head studs following reactor refueling or repair; and

- Provides alternate heat removal capability to cool the reactor in the event that the shutdown cooling mode of the RHR system cannot be established due to failure of the shutdown cooling flow path during plant shutdown.

The RHR system at PBAPS is normally aligned for automatic initiation in the LPCI mode with the suction of each pump aligned to the suppression pool.

EGC's GL 2008-01 review encompassed all sections of the RHR system piping required for the system to operate in LPCI, containment cooling, and shutdown cooling modes. The drywell head spray piping, although abandoned on both PBAPS units, was also included in this review as this section of piping is maintained water solid up to the blank flange outside primary containment.

RAI 1.2 Response

Select portions of process piping were excluded as follows. The Torus full flow test return, suppression pool spray, and drywell spray piping beyond the first normally closed motor operated valve were excluded from this review as this piping is open to the suppression pool or drywell and was not designed to be maintained full of water during system standby. The normally closed motor operated valves are located in close proximity to the associated Torus or drywell penetration with only short lengths of piping downstream of valves. The RHR injection piping beyond the first normally closed isolation valve (i.e., LPCI valve) was also excluded from this review. This piping is only drained during refuel outages and is filled via alignment to the flooded reactor vessel prior to system restoration. During power operation this piping is pressurized out to the respective RHR loop testable check valve.

NRC Request 2: Adequacy of Technical Specification (TS) Requirements and Procedures

RAI 2.1 In scenarios where prompt Emergency Core Cooling System (ECCS) re-alignments and/or valve actuations are required, EGC is requested to describe how TS surveillance requirements (SRs) and other procedures for system return to operability assure that ECCS pipe voiding is not so severe as to inhibit a given in-scope system's operability. The description must include locations including, but not limited to, high points, horizontal runs, and pump suction and discharge pathways. EGC is requested to consider, for example, the information discussed in NRC Information Notice (IN) 87-10, "Potential for Water Hammer During Restart of Residual Heat Removal Pumps," and IN 87-10, Supplement 1.

RAI 2.1 Response

PBAPS has optimized station procedures as applicable to ensure the process piping of in-scope systems is maintained sufficiently full to the extent practical. Low pressure injection system surveillances ensure the stayfull system is placed in-service before securing the pump from its test line-up. This maintains a positive pressure on the system once the pump is secured while the system is re-aligned to its normal standby configuration. Then once the system is restored to its normal standby condition, the system is verified to be filled and vented by performance of a TS surveillance test. The high pressure system surveillance test configuration circulates water from and to the condensate storage tank (CST). The relative elevation of the CST with respect to the HPCI system highpoint ensures that the system remains sufficiently full during testing. Scenarios discussed in the example provided were considered in the GL 2008-01 review for PBAPS.

With regard to IN 87-10, the PBAPS Updated Final Safety Analysis Report (UFSAR) states that the suppression pool cooling mode is part of normal operations during HPCI system and Reactor Core Isolation Cooling (RCIC) system testing. Therefore a LOCA coincident with a loss of offsite power while in the suppression pool cooling mode is part of the station design bases analysis. EGC recognizes that there is a potential for a moderate to severe hydraulic transient upon automatic initiation of LPCI.

PBAPS monitors and trends the time of operation in the suppression pool cooling mode. The time of operation is limited in an effort to minimize the risk of the scenario discussed in the referenced IN. PBAPS maintains suppression pool cooling mode operations less than 5% of its operating time on a 12 month rolling average. This was part of the station response to industry operating experience included in the referenced IN.

The PBAPS original license included surveillance testing of the HPCI and RCIC systems on a monthly frequency. The adoption of Improved Technical Specifications and in-service testing program changes have reduced the testing frequency from once per month to once per 92 days. The lesser frequency testing reduces the number of demands upon the suppression pool cooling mode components, therefore reducing the amount and types of preventive maintenance and monitoring activities that are required to ensure that it is capable of performing its intended function.

NRC Request 3: Procedures – Identifying and Quantifying ECCS Voiding

EGC states that the impact of the voids on system operability is evaluated on a case-by-case basis, with acceptable void volumes being determined as part of the evaluation. EGC is requested to provide the following additional information:

RAI 3.1 Summarize the general procedure and methodology used to perform the evaluations, including the initial determination whether a case-specific evaluation is necessary.

RAI 3.2 Discuss the data collected and input assumptions used in the case-by-case evaluations.

RAI 3.3 Provide a sampling of the conclusions reached from recent case-by-case evaluations.

RAI 3.4 Based on review of the case-by-case evaluations performed to date, discuss whether operability has been determined acceptably or whether additional surveillance beyond TS requirements and fill/vent procedures was warranted, and what additional steps have been taken to assure system operability.

RAI 3.1 Response

Procedural controls require Issue Reports (IRs) to be initiated in the Corrective Action Program (CAP) if gas intrusion/accumulation issues are identified. The IR is then evaluated and dispositioned to determine the cause and identify appropriate corrective actions.

The phrase "full of water" is defined as absent of any gas voids that would adversely affect the systems from meeting their design requirements. EGC also uses this definition to define the phrases "sufficiently full" and "acceptable void volumes." Consistent with the NRC position documented in Reference 1, when voids are discovered in piping, EGC determines through an operability determination whether there is a reasonable expectation that the system in question will perform its specified safety function. Therefore, upon discovery of voids in piping, when there is a reasonable expectation that the system in question will perform its specified safety function, EGC considers the piping "full of water" or "sufficiently full" and in compliance with the associated TS SRs. Actual void volumes in piping systems are typically determined via ultrasonic testing (UT) techniques.

EGC has actively participated in the NEI Gas Accumulation Team, and the respective pressurized water reactor and boiling water reactor owners' groups, activities focused on developing suitable guidance for licensees in the evaluation of voids in the piping systems. These groups have engaged recognized industry experts and Nuclear Steam Supply System vendors to determine the most appropriate criteria applicable to current reactor designs. The assessment of voids on the suction side, through the pump, on the discharge, and the effects on downstream piping and the reactor has been considered. The criteria are documented in eight separate reports generated to support this effort, all of which have been made available to the NRC.

Reference 2 was submitted to the NRC to summarize and focus these separate industry efforts. The enclosure to this letter references these industry documents and provides insight on their application to evaluation of operability. The industry guidance is being used by EGC until such time that the NRC criteria can be formally issued and evaluated.

RAI 3.2 Response

Upon identification of gas accumulation, qualified non-destructive examination (NDE) technicians conduct examinations of the process piping to fully characterize the void. Process piping dimensions, circumferential measurement of void arc, and total void length data are used to compute the void volume. System specific process piping conditions and configuration status provide information on the nature of void (e.g., air/gas intrusion, steam, vacuum). The guidance used in the case-by-case evaluations is discussed above in the response to RAI 3.1.

In addition to evaluating the specific occurrence of voiding, EGC's process requires that the source of the voiding is reasonably well understood, and that sufficient compensatory measures and corrective actions are identified to ensure continued operability until the condition has been resolved.

RAI 3.3 Response

A small gas accumulation was identified in the HPCI discharge piping of the Unit 2 HPCI system. The gas accumulated upstream and downstream of the pump discharge flow element orifice. The void was identified during a UT examination of a process piping location identified as being susceptible to gas accumulation. NDE personnel provided void dimensions. Prior to declaring the system operable, Design Engineering personnel used the assumptions and HPCI system specific information to develop an evaluation documenting the potential impact. The evaluation concluded there was a very low risk of system damage due to the identified gas. The evaluation identified a recommendation that the system be operated to perform dynamic flushing of the identified void. Follow-on corrective action included UT examination of the identified void location to confirm the void was removed. In addition, system walkdowns and performance monitoring observations were carried out during system operation to assess the impact of dynamic flushing. All actions were completed with satisfactory results.

RAI 3.4 Response

To date, every identified issue that has required evaluation has been attributed to accumulation at susceptible locations. In each case the system was maintained inoperable until the gas accumulation issue was resolved. Reasonable assurance of operability has been documented to support system operation for the conduct of dynamic venting activities. Operability has been acceptably determined. The satisfactory completion of all associated corrective actions has effectively demonstrated that the determinations were adequate to assure system operability. No additional surveillance activities beyond TS requirements and existing procedural guidance are necessary.

NRC Request 4: Surveillance Requirements – Ultrasonic Testing

EGC stated that results of the drawing reviews and system walk-downs were collectively evaluated to indentify areas susceptible to gas accumulation, that such identified areas were further evaluated, and, subject to evaluative criteria, that ultrasonic testing (UT) was performed in select locations. Regarding the outcome of this investigation, EGC determined that no new vent locations were deemed necessary, and that the only corrective action pertaining to this investigation would be to perform similar evaluations and testing in the inaccessible areas.

EGC is requested to provide the following additional information regarding the drawing reviews and system walk-downs:

RAI 4.1 Provide any observed discrepancies, and corrective actions used to correct the discrepancies, that were identified during EGC's confirmation of pertinent design details. If no discrepancies were identified, provide a statement confirming this.

RAI 4.2 Where assessment concluded that UT was not necessary, describe the assessment and discuss how the conclusion that UT was not necessary was reached. If a generic approach to performing this assessment was used, a summary of the assessment process adequately responds to this request.

RAI 4.3 EGC is requested to confirm whether all voids will be quantified and recorded.

RAI 4.4 Provide specific details regarding the "graded approach" to UT.

RAI 4.5 Discuss what aspects of the UT procedures will verify that gas was removed after venting and ensure gas was not transported into a high point that was previously found to be gas-free.

RAI 4.1 Response

No discrepancies with pertinent design details were identified during EGC's drawing reviews and system walkdowns.

RAI 4.2 Response

System assessments were performed using the technical considerations documented in the enclosure to GL 2008-01 and system specific information. System process piping segments were excluded from UT examination if none of the following criteria were satisfied:

- Physical attachment to a gas intrusion source;
- Leakage from accumulators or other high pressure sources;
- Leakage from the reactor coolant system (RCS) (i.e., formation of steam pockets);
- Hydrogen coming out of solution/out-gassing of dissolved gas because of a pressure reduction such as through control valves, orifices, and emergency sump screens, or because of elevation changes or venting;
- Leakage through isolation valves or through check valves that can result in gas transport;
- Leakage through faulty vent system components when local system pressure is less than the nominal atmospheric vent pressure;
- Temperatures at or above saturation temperature due to heat conduction through piping connected to the RCS or due to leakage of RCS fluid through isolation valves;
- Suction sources due to formation of air entraining vortices;
- Inadequately designed vents that do not allow proper venting of all accumulated gas; or
- Air-operated valve designs for potential air leakage into the system.

RAI 4.3 Response

Procedural controls require IRs to be initiated in the CAP if gas intrusion/accumulation issues are identified. These documents are permanent plant records. The void characterization has been documented in support of Engineering evaluation and disposition of corrective actions to eliminate the gas accumulation.

RAI 4.4 Response

EGC is actively supporting the industry TSTF and NEI Gas Accumulation Management Team activities regarding resolution of generic TS issues. Until such time that these issues are resolved, EGC has implemented supplemental UT inspections to ensure systems remain free of any voids that could challenge the intended safety function. This approach is described in procedure OP-AA-108-106, "Equipment Return to Service," which directs the use of UT examinations following fill and vent activities during system restoration to ensure voids have been removed.

Based on trending of the actual, recorded UT results, the monitoring frequency may be adjusted. Unexpected or unexplained gas accumulation in a system is entered into CAP for evaluation of operability and whether an increased frequency of monitoring is required. Similarly, sustained gas accumulation free performance in a system is an indication that a relaxed frequency may be appropriate, after a certain confidence level has been established. Monitoring begins at a frequency based on other TS surveillances, and relaxation should proceed incrementally, and is currently limited to not greater than six months.

RAI 4.5 Response

As applicable, system procedures have undergone sequence optimization to drive process flow to the system high points enabling entrained gas to be vented using installed vents. These procedures have also been augmented with guidance to perform UT as a supplemental means of verifying the system is sufficiently full. Performance steps of applicable procedures direct performance of UT examinations as required. Operations personnel are not qualified to perform UT examinations. Therefore, NDE is performed by qualified maintenance technicians in accordance with approved procedures and planned work order activities. The work order activity execution sequence is optimized to verify the system is sufficiently full in a similar fashion as the applicable system procedures. If gas accumulation is identified, activities downstream of the identified location are performed following corrective action to disposition the identified void, thus verifying the gas has not been transported to some other susceptible gas accumulation location. To date, corrective actions executed to disposition identified gas accumulation issues have included the performance of UT examinations at downstream susceptible locations.

NRC Request 5: ECCS Void Surveillance Methods

EGC's evaluation of testing included a discussion of periodic venting of the high pressure coolant injection, core spray, and RHR systems that is currently performed in accordance with TS SRs, and the addition of UT examinations following a "graded approach." EGC is requested to provide the following additional information:

EGC's response for PBAPS references specifically TS SRs and a single return-to-service procedure for filling and venting ECCS components.

RAI 5.1.a Confirm whether additional administrative controls, operational procedures, or other measures, provide for surveillance and venting of ECCS piping.

RAI 5.1.b Discuss the applicability of the referenced fill/vent and surveillance procedures, and any additional plant procedures that are not specifically referenced, with respect to all modes of operation.

RAI 5.1.c If additional fill/vent and surveillance procedures exist, provide a brief, aggregate description. (See Question 5.2 below).

EGC is also requested to provide the following additional information:

RAI 5.2 Provide additional details regarding specific equipment and sub-system locations covered by routine surveillance and the associated performance frequency.

RAI 5.3 Identify piping locations that are not included in scheduled surveillances, and justify the exclusion of these locations with respect to achieving a reasonable assurance of system operability. A broad identification of the excluded locations, such as that provided in Paragraph 3, Page 3 of the PBAPS Generic Letter response dated October 14, 2008, is adequate for the purposes of responding to this RAI.

RAI 5.4 Address operability determinations for as-found voiding conditions. EGC's response to the RAIs in Section 3 (Identifying and Quantifying ECCS Voiding) may adequately address this item.

RAI 5.5 Describe any post-surveillance activities with respect to system voiding.

RAI 5.1.a Response

Until such time that the industry has determined the appropriate changes to TS, and these issues are resolved, EGC has implemented supplemental UT inspections where determined to be needed to ensure systems remain free of voids that could challenge the intended design function. This approach is described in procedure OP-AA-108-106, which directs the use of UT examinations following fill and vent activities during system restoration to ensure voids have been removed. Site procedures were revised to add UT requirements following fill and vent at select vulnerable locations. EGC has also implemented requirements to perform periodic UT examinations on a graded approach.

PBAPS procedures have been revised as required to ensure in-scope systems were verified to be sufficiently full. Each applicable procedure has been annotated to include augmented acceptance criteria to verify the surveillance requirements are fully satisfied. As applicable, station procedures have been revised to include guidance to initiate an IR upon identifying potential gas accumulation. In addition, the station has developed recurring task work orders that contain activities for all system specific gas accumulation locations. For each system in the scope of the GL 2008-01 review, a stand-alone NDE activity exists for susceptible locations. In addition to TS SR testing, the station conducts UT examination of a susceptible location sub-set on a predetermined frequency. The NDE is performed by qualified technicians using approved procedures. Results are documented in the work order activity completion remarks. Periodic monitoring completed to date has confirmed the process piping to be sufficiently full.

RAI 5.1.b Response

There are no additional plant procedures beyond those previously discussed. The procedures previously discussed are the applicable documents for verifying that the systems are sufficiently full in all modes of operation.

RAI 5.1.c Response

There are no additional plant procedures beyond those previously discussed.

RAI 5.2 Response

EGC is performing periodic UT examinations of susceptible locations on a graded approach. Recurring task work orders that contain activities for all system specific gas accumulation locations have been developed. For each system in the scope of the GL 2008-01 review, a stand-alone NDE activity exists for susceptible locations. The frequency of performance has been evaluated and established based on the station operating experience, probability of gas intrusion due to normal gas generation rates, probability of gas intrusion due to normal plant maneuvers and equipment manipulation, and integration of monitoring into normal plant work schedules. Unexpected gas accumulation or changes in the quantity of previously identified gas accumulations are entered into CAP and evaluated for potential increases in monitoring frequency.

RAI 5.3 Response

Assessments conducted during the GL 2008-01 review identified system specific locations that may be susceptible to gas accumulation. Susceptible locations have been evaluated using system specific process information to determine Froude numbers attributed to system flow rates. The combination of the evaluation conclusions, walkdowns, and NDE results have been evaluated to develop a sub-set of the identified system specific susceptible locations that may require supplemental periodic surveillance. Those locations subjected to system flow rates that produce acceptable Froude values are not subject to periodic monitoring.

RAI 5.4 Response

This item is addressed above in response to NRC Request 3.

RAI 5.5 Response

Each surveillance procedure has been revised as applicable to direct the appropriate post-surveillance action. The case-by-case evaluation and operability determination process is driven by the corrective action program and operability requirements.

NRC Request 6: ECCS Fill and Vent Procedures

In its discussion concerning procedures associated with fill and vent activities, EGC described the adequacy of revisions completed to, and revisions planned for, Procedure OP-AA-108-106, "Equipment Return to Service."

EGC is requested to summarize the procedural aspects that pertain to RAIs 6.1, 6.2 and 6.3 below. Also, EGC is requested to discuss what revisions have been completed or are planned for each of the following aspects of vent/fill activities:

RAI 6.1 Guarding against gas intrusion because of inadvertent draining, system realignments, incorrect maintenance procedures, or other evolutions.

RAI 6.2 Controlling and revising work packages due to changes in maintenance work scope.

RAI 6.3 Monitoring of pump operation in all modes and specialized monitoring of appropriate plant parameters during shutdown operation, including reactor vessel water level control.

RAI 6.1 Response

EGC relies upon a competent, trained, qualified, and attentive staff to continuously monitor, assess, and control system configuration. Upon recognition of a human performance error or equipment failure, IRs are initiated in the CAP. The CAP and the enhancements implemented in response to GL 2008-01 provide suitable guidance for the mitigation and disposition of the event.

RAI 6.2 Response

A change in work package scope after the original approved package has begun requires independent administrative reviews prior to field execution. Work package changes require review and approval of Operations shift management to obtain authorization as well as a maintenance foreman approval. The administrative controls (i.e., work management procedures) and the enhancements to applicable system operating and fill/vent procedures are adequate to ensure system configuration is appropriately controlled. On a case-by-case basis, individual scope changes are assessed to ensure adequate measures are in place to verify systems are sufficiently full prior to their restoration and return to service.

RAI 6.3 Response

Suitable administrative measures (i.e., clearance and tagging) combined with existing system operating procedures and routine performance monitoring conducted by plant operations personnel are adequate to ensure measures are in place to verify systems are sufficiently full prior to their restoration and return to service.

NRC Request 7: Training

Training was not identified in the GL but is considered to be a necessary part of applying procedures and other activities when addressing the issues identified in GL 2008-01.

RAI 7.1 EGC is requested to provide a brief description regarding training as it relates to pipe voiding issues.

RAI 7.1 Response

GL 2008-01 did not require discussion of training to satisfy the 10 CFR 50.54(f) request; therefore, none was provided in the GL response for PBAPS. However, when any station procedure is modified, an assessment for training needs and change management is required in accordance with procedure AD-AA-101, "Processing of Procedures and T&RMs." The determination is typically a function of the nature of the change and the perceived impact on the organization. If the assessment concludes training is required, the training is generally accomplished prior to, or in parallel with, issuance of the procedure. For fill and vent procedure revisions, the changes have generally been minor, and have been considered enhancements. Work orders which direct the periodic examination of selected piping for the presence of air were created to draw upon pre-existing processes that provide guidance for the UT inspection of piping to verify that it is full of water. Training of personnel performing UT inspection is in accordance with corporate procedure ER-AA-335-001, "Qualification and Certification of Nondestructive Examination (NDE) Personnel."

EGC is an active participant in the NEI Gas Accumulation Team, which is currently directing the Institute of Nuclear Power Operations (INPO) in the development of generic training modules for gas accumulation and management. These training modules target the Engineering, Operations, and Maintenance disciplines. Based on this active participation, EGC plans to evaluate these training modules following completion for applicability to EGC, and may conduct training based upon modules tailored to meet EGC's needs.

References

1. Memorandum from L. D. Wert, Jr. (U.S. NRC) to T. B. Blount (U.S. NRC), "Task Interface Agreement – Emergency Core Cooling System (ECCS) Voiding Relative to Compliance with Surveillance Requirements (SR) 3.5.1.1, 3.5.2.3, and 3.5.3.1 (TIA 2008-03)," dated October 21, 2008

2. Letter from J. H. Riley (Nuclear Energy Institute) to W. H. Ruland (U.S. NRC), "Industry Guidance – Evaluation of Unexpected Voids or Gas Identified in Plant ECCS and Other Systems," dated June 18, 2009