

July 8, 2000

MEMORANDUM TO: Harold K. Chernoff, Chief
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

FROM: Peter Bamford, Project Manager */ra/*
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 - ELECTRONIC
TRANSMISSION, DRAFT REQUEST FOR ADDITIONAL INFORMATION
REGARDING RELIEF REQUEST I3R-13, PRESSURE TESTING OF
PRIMARY CONTAINMENT INSTRUMENT GAS PIPING (TAC NOS.
ME3141 AND ME3142)

The attached draft request for additional information (RAI) was transmitted by electronic transmission on July 6, 2010, to Mr. Thomas Loomis, at Exelon Generation Company, LLC (Exelon). This draft RAI was transmitted to facilitate the technical review being conducted by the Nuclear Regulatory Commission (NRC) staff and to support a conference call (if needed) with Exelon in order to clarify the licensee's submittal. The draft RAI is related to Exelon's submittal dated January 22, 2010, regarding a relief request submitted for Limerick Generating Station, Units 1 and 2. The request proposes an alternative to the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," concerning a system leakage test with a VT-2 visual examination for the Primary Containment Instrument Gas (PCIG) piping. The draft questions were sent to ensure that they were understandable, the regulatory basis was clear, and to determine if the information was previously docketed. Additionally, review of the draft RAI would allow Exelon to evaluate and agree upon a schedule to respond to the RAI. This memorandum and the attachment do not represent an NRC staff position.

Docket Nos. 50-352 and 50-353

Enclosure: As stated

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LPL1-2 R/F

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DATE	7/8/10	07/06/2010

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REQUEST FOR ADDITIONAL INFORMATION

LIMERICK GENERATING STATION, UNITS 1 AND 2

RELIEF REQUEST I3R-13

PRESSURE TESTING OF PRIMARY CONTAINMENT INSTRUMENT GAS PIPING

DOCKET NOS. 50-352 AND 50-353

By letter dated January 22, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML100261546), Exelon Generation Company, LLC (Exelon, the licensee) submitted a relief request for Limerick Generating Station (LGS), Units 1 and 2. The request proposes an alternative to the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," Table IWD-2500-1, concerning a system leakage test with a VT-2 visual examination. The proposed alternative would apply to the Primary Containment Instrument Gas (PCIG) piping as specified in the submittal. The Nuclear Regulatory Commission staff has been reviewing the submittal and has determined that additional information is needed to complete its review.

1. For the proposed alternative pressure decay test, what would be an acceptable rate of pressure loss above which the licensee would initiate leak detection and perform necessary corrective action to repair/replace any leakage in the piping?
2. What is the operating pressure for the PCIG piping to which the piping is required to be pressurized during system leakage test?