

10 CFR 50.55a(g)(4)(iv)

RS-11-165
RA-11-079
TMI-11-146

October 7, 2011

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Braidwood Station, Units 1 and 2
Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and STN 50-457

Byron Station, Units 1 and 2
Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. STN 50-454 and STN 50-455

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

Dresden Nuclear Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Limerick Generating Station, Units 1 and 2
Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

Oyster Creek Nuclear Generating Station
Renewed Facility Operating License No. DPR-16
NRC Docket No. 50-219

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

Request to Use a Portion of a Later
Edition of the ASME B&PV
Code, Section XI
October 7, 2011
Page 2

Quad Cities Nuclear Power Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

Three Mile Island Nuclear Station, Unit 1
Renewed Facility Operating License No. DPR-50
NRC Docket No. 50-289

Subject: Request to Use a Portion of a Later Edition of the ASME B&PV Code, Section XI

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(4)(iv), Exelon Generation Company, LLC (Exelon) is requesting NRC approval to use a portion of a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components." Specifically, Exelon proposes to implement Mandatory Appendix I, I-2600, "Appendix VIII Examination," from the 2007 Edition through the 2008 Addenda of the ASME B&PV Code. Implementation of Mandatory Appendix I, I-2600 from the 2007 Edition through 2008 Addenda will permit the use of Appendix VIII Performance Demonstration Initiative (PDI) techniques to be used for components to which Appendix VIII is not applicable. The approval of the 2007 Edition through the 2008 Addenda of the ASME B&PV Code for use was announced in the Federal Register on June 21, 2011 (i.e., 76 FR 36232).

There are no regulatory commitments contained in this letter.

Exelon requests your review and approval of this fleet request by October 7, 2012.

If you have any questions, please contact Tom Loomis (610) 765-5510.

Respectfully,

A handwritten signature in black ink, appearing to read "Michael D. Jesse", is written over a horizontal line.

Michael D. Jesse
Director - Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Attachment: Request to Use a Portion of a Later Edition of the ASME B&PV Code, Section XI

cc: Regional Administrator - NRC Region I
Regional Administrator - NRC Region III
NRC Senior Resident Inspector - Braidwood Station
NRC Senior Resident Inspector - Byron Station
NRC Senior Resident Inspector - Clinton Power Station
NRC Senior Resident Inspector - Dresden Nuclear Power Station
NRC Senior Resident Inspector - LaSalle County Station
NRC Senior Resident Inspector - Limerick Generating Station
NRC Senior Resident Inspector - Oyster Creek Nuclear Generating Station
NRC Senior Resident Inspector - Peach Bottom Atomic Power Station
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station
NRC Senior Resident Inspector - Three Mile Island Nuclear Generating Station, Unit 1
NRC Project Manager - Braidwood and Byron Stations
NRC Project Manager - Clinton Power Station
NRC Project Manager - Dresden Nuclear Power Station
NRC Project Manager - LaSalle County Station
NRC Project Manager - Limerick Generating Station
NRC Project Manager - Oyster Creek Nuclear Generating Station
NRC Project Manager - Peach Bottom Atomic Power Station
NRC Project Manager - Quad Cities Nuclear Power Station
NRC Project Manager - Three Mile Island Nuclear Generating Station, Unit 1

Attachment

Request to Use a Portion of a Later Edition of the ASME B&PV Code, Section XI

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(4)(iv) and the guidance provided in Reference 1, Exelon Generation Company, LLC (Exelon) requests NRC approval to use specific provisions of a later edition and addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, for the plants identified in Section 2 of this letter. Currently, ASME Section XI, IWA-2232 (for the editions identified in Section 2) requires that ultrasonic (UT) examinations be conducted in accordance with Mandatory Appendix I. Current versions of Mandatory Appendix I, I-2000 (for the editions identified in Section 2) required the performance of ultrasonic examinations in accordance with Appendix III, Appendix VIII, or Section V, Article 4, without substitution. In lieu of the current versions (for the editions identified in Section 2) of Mandatory Appendix I, I-2000 (for the editions identified in Section 2), Exelon requests the use of Mandatory Appendix I, I-2600 ("Appendix VIII Examination") from the 2007 Edition through the 2008 Addenda of the ASME B&PV Code, Section XI. This provision states:

- a) For components to which Appendix VIII is not applicable, examination procedures, personnel, and equipment qualified in accordance with Appendix VIII may be applied, provided such components, materials, sizes, and shapes are within the scope of the qualified examination procedure.
- (b) Examination coverage shall be in accordance with I-3000.
- (c) No other I-1000 or I-2000 requirements apply.

Exelon will implement I-2600 from the 2007 Edition through the 2008 Addenda of the ASME B&PV Code. This new provision permits the use of Appendix VIII Performance Demonstration Initiative (PDI) techniques for components to which Appendix VIII is not mandatory.

The 2007 Edition through the 2008 Addenda of the ASME B&PV Code was approved for use in Federal Register 76 FR 36232, dated Tuesday, June 21, 2011.

Industry experience has demonstrated that use of Appendix VIII techniques for detection and characterization of flaws is equal to or surpasses the requirements of the ASME Code, Section XI, Appendix III or Section V, Article 4.

1. ASME Code Component(s) Affected:

This change may be applied to examinations where the alternative conditions of I-2600 are applicable.

2. Applicable Code Edition and Addenda:

<u>PLANT</u>	<u>INTERVAL</u>	<u>EDITION</u>	<u>START</u>	<u>END</u>
Braidwood Station, Units 1 and 2	Third	2001 Edition, through 2003 Addenda	July 29, 2008 October 17, 2008	July 28, 2018 October 16, 2018
Byron Station, Units 1 and 2	Third	2001 Edition, through 2003 Addenda	January 16, 2006	July 15, 2016
Clinton Power Station	Third	2004 Edition	July 1, 2010	June 30, 2020
Dresden Nuclear Power Station, Units 2 and 3	Fourth	1995 Edition, through 1996 Addenda	January 20, 2003	January 19, 2013
LaSalle County Stations, Units 1 and 2	Third	2001 Edition, through 2003 Addenda	October 1, 2007	September 30, 2017
Limerick Generating Station, Units 1 and 2	Third	2001 Edition, through 2003 Addenda	February 1, 2007	January 31, 2017
Oyster Creek Nuclear Generating Station	Fourth	1995 Edition, through 1996 Addenda	October 15, 2002	October 14, 2012
Peach Bottom Atomic Power Station, Units 2 and 3	Fourth	2001 Edition, through 2003 Addenda	November 5, 2008	November 4, 2018
Quad Cities Nuclear Power Station, Units 1 and 2	Fourth	1995 Edition, through 1996 Addenda	March 10, 2003	April 1, 2013
Three Mile Island Nuclear Station, Unit 1	Fourth	2004 Edition	April 20, 2011	April 19, 2022

3. Proposed Subsequent Code Edition and Addenda (or Portion):

Exelon requests the use of Mandatory Appendix I, I-2600 from the 2007 Edition through the 2008 Addenda of the ASME B&PV Code, Section XI for the remainder of the intervals specified in Section 2.

4. Related Requirements:

10 CFR 50.55a(g)(4)(iv) states:

"Inservice examination of components and system pressure tests may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (b) of this section, subject to the conditions listed in paragraph (b) of this section, and subject to Commission approval. Portions of editions or addenda may be used provided that all related requirements of the respective editions or addenda are met."

10 CFR 50.55a(b)(2) incorporated by reference Section XI, Division 1, of the ASME B&PV Code, 2007 Edition through the 2008 Addenda as approved in Reference 2. There are no limitations or modifications in 10 CFR 50.55a(b)(2) related to Mandatory Appendix I, I-2600 ("Appendix VIII Examination") for the 2007 through 2008 Addenda of Section XI.

In addition, the I-3000 Examination Coverage requirements listed in the ASME 2007 Edition with the 2008 Addenda will be utilized in conjunction with the components examined in accordance with I-2600.

5. Duration of Proposed Request:

This provision will be used for the remainder of the intervals specified in Section 2.

6. References:

1. NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," dated July 28, 2004
2. Federal Register 76 FR 36232, dated Tuesday, June 21, 2011