

10 CFR 50.55a

TMI-12-070  
April 18, 2012

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

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

Subject: Relief Request PR-05 Associated with the Fourth Inservice Testing (IST) Interval

- References:
- 1) Letter from M. Jesse (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Submittal of Relief Request PR-05 Associated with the Fourth Inservice Testing (IST) Interval," dated October 28, 2011
  - 2) Letter from P. Bamford (U.S. Nuclear Regulatory Commission) to M. Pacilio (Exelon Generation Company, LLC), "Three Mile Island Nuclear Station, Unit 1 - Request for Additional Information Regarding Relief Request PR-05, Relief Request Associated with Fourth Inservice Testing Interval (TAC NO. ME7532)," dated April 4, 2012

In the Reference 1 letter, Exelon Generation Company, LLC submitted a relief request associated with the fourth Inservice Testing (IST) ten-year interval for Three Mile Island Nuclear Station (TMI), Unit 1. TMI, Unit 1 requested relief to perform alternative testing of the Reactor Building Emergency Cooling River Water pumps. In the Reference 2 letter, the U.S. Nuclear Regulatory Commission requested additional information. Attached is our response to this request.

There are no regulatory commitments in this letter.

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

Respectfully,



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

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Attachment: Response to Request for Additional Information - Relief Request PR-05

cc: Regional Administrator, Region I, USNRC  
USNRC Senior Resident Inspector, TMI  
USNRC Project Manager, [TMI] USNRC

**Attachment**

**Response to Request for Additional Information - Relief Request PR-05**

**Question:**

"PR-05 - Request for Additional Information:

Does the test proposed in your submittal use a fixed system resistance to establish a repeatable reference condition and then measure, record, and evaluate pump differential pressure to assess pump performance trends? If so, then this approach does not appear to the NRC technical staff to be a deviation from the requirements of OM Code and, therefore, does not require relief. Please note that NRC regional inspection staff have previously reached a similar conclusion regarding testing of these pumps as documented in Inspection Report No. 050000289/2004004, dated November 8, 2004 (ADAMS Accession No. ML043150481). Also please note that, interpretation of ASME OM Code requirements is the purview of the ASME Committee on Operations and Maintenance and, if needed, their inquiry process is available for assistance in clarifying OM Code requirements."

**Response:**

Following additional review of the ASME OM Code and the conclusions in Inspection Report No. 05000289/2004004, Exelon Generation Company, LLC (Exelon) agrees that the proposed testing of Reactor Building Emergency Cooling River Water Pumps RR-P-1A/B meets the intent of the ASME OM Code for a Group B pump test and adequately monitors pump performance and therefore this relief request is not needed. The test condition is at a substantial, repeatable flow at the "readily duplicated" reference point. Pump performance is then evaluated between comprehensive pump tests by the trends of differential pressure. In view of this information, Exelon hereby withdraws this relief request.