



TMI-12-137
September 10, 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: Request to Use a Provision of a Later Addenda of the ASME Code for
Operation and Maintenance of Nuclear Power Plants

Reference: 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

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (f)(4)(iv), and the guidance provided in the reference document, Exelon Generation Company, LLC (EGC) requests NRC approval to use a specific provision of a later addenda of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants for Three Mile Island Nuclear Station (TMI), Unit 1. Specifically, EGC proposes to use the ASME OM Code, 2004 Edition through the 2006 Addenda, Paragraph ISTB-3510, "General" requirements for pump data collection. Subparagraph ISTB-3510(b)(2) allows pump inservice testing reference values up to 90% of the calibrated range of digital instruments. The current applicable OM Code of record for TMI, Unit 1 specifies that the reference value not exceed 70% of the calibrated range of digital instruments. Based on a start date of September 23, 2004, the fourth ten-year TMI, Unit 1 Inservice Testing (IST) Program complies with the requirements of the ASME Code for Operation and Maintenance of Nuclear Power Plants, 1998 Edition through 2000 Addenda.

EGC requests approval of this request by September 10, 2013.

There are no regulatory commitments in this letter.

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and Maintenance of Nuclear Power Plants
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If you have any questions concerning this letter, please contact Tom Loomis at (610) 765-5510.

Respectfully,

A handwritten signature in cursive script, appearing to read "Michael D. Jesse", written over a horizontal line.

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

Attachment: Request to Use a Provision of Later Addenda of the ASME OM Code

cc: W. Dean, Regional Administrator, Region I, USNRC
D. L. Werkheiser, USNRC Senior Resident Inspector, TMI
P. J. Bamford, USNRC Project Manager

ATTACHMENT

**Request to Use a Provision of a Later Addenda of the
ASME OM Code**

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (f)(4)(iv) and the guidance provided in Reference 1, Exelon Generation Company, LLC (EGC) requests NRC approval to use specific provisions of a later addenda of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants for Three Mile Island Nuclear Station (TMI), Unit 1. Specifically, EGC proposes to use the ASME OM Code, 2004 Edition through the 2006 Addenda, Paragraph ISTB-3510, "General" requirements for pump data collection. Subparagraph ISTB-3510(b)(2) allows pump inservice testing reference values up to 90% of the calibrated range of digital instruments. ASME Code Case OMN-6, "Alternate Rules for Digital Instruments," allows the reference value to be up to 90% of the instrument range and was issued and approved in Regulatory Guide (RG) 1.192 ("Operation and Maintenance Code Case Acceptability, ASME OM Code"), dated June 2003. The Code Case is applicable to the 1990 - 1997 Editions of the OM Code. TMI, Unit 1 uses the 1998 Edition through the 2000 Addenda. Therefore, this Code Case does not apply, and RG 1.192 has not yet been revised to approve an updated version of OMN-6. The provisions of Code Case OMN-6 have since been incorporated into the OM Code, beginning in the Omb-2006 Addenda which has been approved for use by the NRC (Reference 2).

1. ASME Code Component(s) Affected:

All pumps in the IST Program Scope at TMI, Unit 1, but it is specifically needed for testing the Boric Acid Injection Pumps, 1-CA-P-1A/B.

2. Applicable Code Edition and Addenda:

The current code of record for the TMI, Unit 1 Inservice Testing (IST) Program is the ASME OM Code, 1998 Edition through the 2000 Addenda.

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

Specifically, EGC proposes to use the ASME OM Code, 2004 Edition through the 2006 Addenda, Paragraph ISTB-3510, "General" requirements for pump data collection. Subparagraph ISTB-3510(b)(2) allows pump inservice testing reference values up to 90% of the calibrated range of digital instruments.

4. Related Requirements:

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

"Inservice tests of pumps and valves 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 NRC 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)(3) incorporated by reference the ASME OM Code, 2004 Edition through the 2006 Addenda. There are no limitations or modifications in 10 CFR 50.55a(b)(3) related to Paragraph ISTB-3510, "General" requirements for pump data collection.

A related 2006 Addenda change is that ISTB-3510 no longer includes the requirement for the instrumentation to be calibrated in accordance with the owner's QA program. This requirement was previously in subparagraph (d) of ISTB-3510, 1998 Edition through the 2000 Addenda. This requirement has been moved to ISTA-4200 in the 2004 Edition through the 2006 Addenda. EGC recognizes the importance of properly maintaining instrumentation used for inservice testing and will comply with related paragraph ISTA-4200 and maintain all IST instrumentation in the existing calibration program. The digital flow instrumentation used for testing the Boric Acid Injection Pumps does not require field calibration, but it is included in the station's program for maintaining inservice testing instrumentation to ensure that it is properly calibrated following possible maintenance or replacement.

5. Duration of Proposed Request:

The fourth ten-year interval for TMI, Unit 1 began on September 23, 2004, and will conclude on September 22, 2014. TMI, Unit 1 proposes to utilize this approval for the remainder of the interval.

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 June 21, 2011