



TMI-13-022
February 12, 2013

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: Response to Request for Additional Information - Request to Use a Provision of a Later Addenda of the ASME Code for Operation and Maintenance of Nuclear Power Plants

- References:
- 1) Letter from M. D. Jesse (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Request to Use a Provision of a Later Addenda of the ASME Code for Operation and Maintenance of Nuclear Power Plants," dated September 10, 2012
 - 2) Letter from P. Bamford (U.S. Nuclear Regulatory Commission) to M. J. Pacilio ((Exelon Generation Company, LLC), "Three Mile Island Nuclear Station, Unit 1 - Request to Use a Provision of a Later Addenda of the American Society of Mechanical Engineers Code for Operation and Maintenance of Nuclear Power Plants (TAC NO. ME9510)," dated February 7, 2013

In the Reference 1 letter, Exelon Generation Company, LLC (Exelon) requested 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 proposed 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. In the Reference 2 letter, the U.S. Nuclear Regulatory Commission Staff requested additional information. Attached is our response.

There are no regulatory commitments in this letter.

Response to Request for Additional Information –
Request to Use a Provision of a Later
Addenda of the ASME Code for Operation
and Maintenance of Nuclear Power Plants
February 12, 2013
Page 2 of 2

If you have any questions concerning this letter, please contact Tom Loomis at (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 & Regulatory Affairs
Exelon Generation Company, LLC

Attachments: 1) Response to Request for Additional Information
2) Updated Request to Use Later Edition 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 1

Response to Request for Additional Information

Question:

- 1.) Paragraph 50.55a(f)(4)(iv) of Title 10 of the *Code of Federal Regulation* (10 CFR) allows the use of later ASME Code editions or addenda. As noted in NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME Code and Section XI," use of a specific portion of a later ASME Code edition and addenda is allowed, provided that all requirements of respective editions or addenda are met. Since only a specific portion of a later ASME Code edition and addenda are to be used, the licensee is requested to address whether all related requirements of the respective editions and addenda will be met for the pumps that are the subject of this request.

Additionally, to avoid confusion with any potential future request, or revision to this request, the NRC requests that the licensee assign a specific number and title to the request.

Response:

There are no other related requirements necessary to implement this request.

Additionally, attached is the request with a number (LE-01) and title included. We also note that the start date of the next interval has been revised. This change is provided in the Attachment 2 updated request.

ATTACHMENT 2

Updated Request to Use Later Edition of the ASME OM Code

10 CFR 50.55a Later Edition Request LE-01
Revision 0
(Page 1 of 2)

Request to Use a Later Edition of the ASME OM Code - Paragraph ISTB-3510, "General" Requirements for Pump Data Collection

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 Later Edition Request LE-01

Revision 0

(Page 2 of 2)

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.

There are no other related requirements necessary to implement this request.

5. Duration of Proposed Request:

The fourth ten-year interval for TMI, Unit 1 began on September 23, 2004, and will conclude on October 14, 2013. 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