



10 CFR 50.55a

TMI-13-043

March 15, 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 - Relief Request VR-01
Associated with the Fifth Inservice Testing (IST) Interval

- References:
- 1) Letter from M. Jesse (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Submittal of Relief Request VR-01 Associated with the Fifth Inservice Testing (IST) Interval," dated October 18, 2012
 - 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 VR-01, Associated with the Fifth Inservice Testing Interval (TAC No. ME9819)," dated February 25, 2013

In the Reference 1 letter, Exelon Generation Company, LLC (Exelon) submitted for your review and approval Relief Request VR-01 associated with the Fifth Inservice Testing (IST) interval for Three Mile Island Nuclear Station (TMI), Unit 1. 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.

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

Response to Request for Additional Information -
RR VR-01 Associated with the Fifth Inservice Testing (IST) Interval
March 15, 2013
Page 2

Attachment: Response to Request for Additional Information - Relief Request VR-01

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

Attachment

Response to Request for Additional Information - Relief Request VR-01

Question:

1.) The PORV, 1-RC-RV-2, is categorized as a B/C valve in the referenced request. In addition to the requirements of the OM Code, ISTC-3310 and ISTC-3510 (for which relief is being requested), are any other ASME OM Code ISTC or Mandatory Appendix I test requirements applicable to this valve? Please provide any specific ASME OM Code test requirements for this valve type, but don't provide general test requirements from the OM Code.

Response:

Exelon Generation Company, LLC (Exelon) has determined that the following specific ASME OM Code requirements also apply to the Three Mile Island Nuclear Station (TMI), Unit 1 pressurizer Pilot Operated Relief Valve (PORV) and is not requesting relief from any of these:

- ISTC-5110, "Power-Operated Relief Valves (PORVs)." - "Power-operated relief valves shall meet the requirements of ISTC-5100 for the specific Category B valve type and ISTC-5240 for Category C valves." This paragraph specifies the applicable testing for the type of power operator and that Mandatory Appendix I has additional test requirements invoked by ISTC-5240. These requirements are outlined in the following items.
- ISTC-5111, "Valve Testing Requirements" - This requirement specifies the sequence of the individual tests - seat tightness / leakage testing, stroke testing, and position indication testing. It also requires calibration of the pressure-sensing device in accordance with the Owner's QA program. Position indication testing has been determined to not apply to the TMI, Unit 1's PORV design.
- ISTC-5112, "Leak Testing" - This requirement specifies that seat tightness of the PORV shall be verified by leak testing in accordance with the requirements of Mandatory Appendix I. This paragraph directs leak testing using the test methodology and requirements for relief valves.
- ISTC-5113, "Valve Stroke Testing" - This requirement provides the Category B exercising requirements, which include stroke time measurement, establishment of limiting stroke time, and testing at normal operating conditions.
- I-8110, "Steam Service" - This requirement specifies the detailed testing requirements for exercising the valve. Those that apply to TMI, Unit 1's PORV testing are: test media, thermal equilibrium, and ambient temperature.
- I-8200, "Seat Tightness Testing" - This requirement specifies that seat tightness testing shall be performed in accordance with the Owner's valve test procedure. Consideration shall be given to test media, temperature stability, and ambient temperature, as required in I-8100. Seat tightness testing shall be performed using

the same fluid used for set-pressure testing, except as provided by I-8300. This paragraph and associated subparagraphs (I-8210, I-8220, and I-8230) specify seat tightness testing using relief valve requirements (specified in I-8100). The plant's PORV is not tested with alternative media.

The PORV testing described in Exelon's relief request complies with these requirements to ensure the operational readiness of the valve.

Question:

2.) Is the Pressurizer PORV block valve included in the TMI-1 1ST program? If not, please provide the basis for not including this valve in the program.

Response:

The pressurizer PORV block valve is identified as 1-RC-V-2 in the TMI, Unit 1 IST Program Plan, and this valve is included in the scope of the program with both open and closed safety functions.