



# Exelon Generation®

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USNRC

200 Exelon Way  
Kennett Square, PA 19348

www.exeloncorp.com

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Ms. Cindy Bladey  
Office of Administration  
Mail Stop: OWFN-12-H08  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

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12/24/2015  
80FR80401

**Subject:** Comments on Draft Regulatory Issue Summary 20YY-XX, "Containment Shell or Liner Moisture Barrier Inspection" (Federal Register 80FR80401, dated December 24, 2015, Docket ID NRC-2015-0285)

This letter is being submitted in response to the U.S. Nuclear Regulatory Commission's (NRC's) request for comments concerning the subject draft Regulatory Issue Summary (RIS) 20YY-XX, "Containment Shell or Liner Moisture Barrier Inspection" (i.e., Federal Register 80FR80401, dated December 24, 2015).

The NRC is issuing this draft RIS to reiterate its position in regard to Inservice Inspection (ISI) requirements for moisture barrier materials, as discussed in 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," Subsection IWE.

Exelon Generation Company, LLC (Exelon) appreciates the opportunity to comment on the draft RIS and offers the comment below for consideration by the NRC.

### Comment

- Page 4 of 5, First Full Paragraph, Fourth Sentence

The beginning of the sentence states: "If a material prevents moisture from contacting inaccessible areas of the containment shell or liner...." Exelon believes that this description is too broad and might be susceptible to a very open interpretation. Exelon suggests rewording the opening phrase in the sentence to read: "If a material is installed to prevent moisture from contacting inaccessible areas of the containment shell or liner...." Exelon recommends that the NRC describe what is not a moisture barrier, such as leak channeling devices or containment structural materials that do not prevent moisture intrusion directly into an interface of material between the containment liner and the subject material. For example, an equipment hatch condensation collection system that collects moisture dripping from the hatch and routes the condensate to a drain rather than running down a liner to an installed moisture barrier as shown in Figure IWE-2500-1 is not a moisture barrier material as described in this RIS.

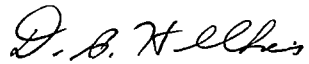
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Add= B. Lehman (bcl)

U.S. Nuclear Regulatory Commission  
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January 25, 2016  
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If you have any questions or require additional information, please do not hesitate to contact Richard Gropp at (610) 765-5557.

Respectfully,



David P. Helker  
Manager, Licensing and Regulatory Affairs  
Exelon Generation Company, LLC