

July 26, 2016

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

Braidwood Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and 50-457

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Limerick Generating Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

Nine Mile Point Nuclear Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-63 and NPF-69
NRC Docket Nos. 50-220 and 50-410

Peach Bottom Atomic Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277 and 50-278

R.E. Ginna Nuclear Power Plant
Renewed Facility Operating License No. DPR-18
NRC Docket No. 50-244

Subject: Relief Request for an Alternative to the ASME Code

Pursuant to 10 CFR 50.55a(z), Exelon Generation Company, LLC (EGC) is submitting a relief request for Braidwood Station, Units 1 and 2; Clinton Power Station, Unit 1; LaSalle County Station, Units 1 and 2; Limerick Generating Station, Units 1 and 2; Nine Mile Point Nuclear Station, Units 1 and 2; Peach Bottom Atomic Power Station, Units 2 and 3; and R.E. Ginna Nuclear Power Plant.

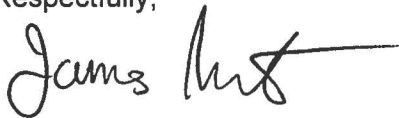
U.S. Nuclear Regulatory Commission
RR – Alternative to ASME Code
July 26, 2016
Page 2

The relief request proposes an alternative to the testing frequencies in the American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) Code, by adoption of approved Code Case OMN-20, "Inservice Test Frequency," for the current 10-Year Inservice Testing (IST) interval.

There are no regulatory commitments contained in this letter.

If you have any questions regarding this letter, please contact Laura A. Lynch at (610) 765-5729.

Respectfully,



James Barstow
Director - Licensing & Regulatory Affairs
Exelon Generation Company, LLC

cc: Regional Administrator - NRC Region I
 Regional Administrator - NRC Region III
 NRC Senior Resident Inspector - Braidwood Station
 NRC Senior Resident Inspector - Clinton Power Station
 NRC Senior Resident Inspector - LaSalle County Station
 NRC Senior Resident Inspector - Limerick Generating Station
 NRC Senior Resident Inspector - Nine Mile Point Nuclear Station
 NRC Senior Resident Inspector - Peach Bottom Atomic Power Station
 NRC Senior Resident Inspector - R.E. Ginna Nuclear Power Plant

DESCRIPTION AND ASSESSMENT OF THE PROPOSED ALTERNATIVE TO THE ASME CODE

Request in Accordance with 10 CFR 50.55a(z)(2)

Alternative Due To Hardship Without a Compensating Increase in Quality and Safety

1.0 DESCRIPTION

The request is to adopt a proposed alternative to the American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) Code by adoption of approved Code Case OMN-20, "Inservice Test Frequency."

2.0 ASSESSMENT

Technical Evaluation of the Proposed Alternative to the OM Code

Section IST of Division 1 of the OM Code, which is incorporated by reference in 10 CFR 50.55a(a), specifies component test frequencies based either on elapsed time periods (e.g., quarterly, 2 years) or on the occurrence of a plant condition or event (e.g., cold shutdown, refueling outage).

ASME Code Case OMN-20, "Inservice Test Frequency," has been approved for use by the ASME OM committee as an alternative to the test frequencies for pumps and valves specified in ASME OM, Division 1, Section IST, 2009 Edition through OMa-2011 Addenda, and all earlier editions and addenda of ASME OM Code.

Code Case OMN-20 is not referenced in the latest revision of Regulatory Guide 1.192 (August 2014) as an acceptable OM Code Case to comply with 10 CFR 50.55a(f) requirements as allowed by 10 CFR 50.55a(b)(6). The proposed alternative is to use Code Case OMN-20 to extend or reduce the IST frequency requirements for the Braidwood Station, Units 1 and 2, third; Clinton Power Station, Unit 1, third; LaSalle County Station, Units 1 and 2, third and fourth; Limerick Generating Station, Units 1 and 2, third; Nine Mile Point Nuclear Station, Unit 1, fourth; Nine Mile Point Nuclear Station, Unit 2, third; Peach Bottom Atomic Power Station, Units 2 and 3, fourth; R.E. Ginna Nuclear Power Plant fifth 10-Year IST interval or until OMN-20 is incorporated into the next revision of Regulatory Guide 1.192.

ASME Code Components Affected

The Code Case applies to pumps and valves specified in ASME OM, Division 1, Section IST, 2009 Edition through OMa-2011 Addenda and all earlier editions and addenda of ASME OM Code. Frequency extensions may also be applied to accelerated test frequencies (e.g., pumps in Alert Range) as specified in OMN-20.

For pumps and valves with test periods of two years or less, the test frequency allowed by OMN-20 and the current TS Inservice Testing Program (as modified by SR 3.0.2, or equivalent, and EGM 2012-001) are the same. For pumps and valves with test frequencies greater than two years, OMN-20 allows the test frequency to be extended by

six months. The current TS Inservice Testing Program does not allow extension of test frequencies that are greater than two years.

Applicable Code Edition and Addenda

ASME Code Case OMN-20 applies to ASME OM, Division 1, Section IST, 2009 Edition through OMa-2011 Addenda and all earlier editions and addenda of ASME OM Code.

The Braidwood Station, Units 1 and 2, Code Edition and Addenda that are applicable to the program interval are IST ASME OM Code 2001 Edition through 2003 Addenda. The Braidwood Station, Units 1 and 2, current interval ends July 28, 2018.

The Clinton Power Station, Unit 1, Code Edition and Addenda that are applicable to the program interval are the ASME OM Code 2004 Edition, no Addenda. The Clinton Power Station, Unit 1, current interval ends June 30, 2020.

The LaSalle County Station, Units 1 and 2, Code Edition and Addenda that are applicable to the third 10-year program interval are IST ASME OM Code 2001 through 2003 Addenda. The LaSalle County Station, Units 1 and 2, third 10 year program interval ends October 11, 2017. The Code Edition and Addenda that are applicable to the fourth 10-year program interval are ASME OM Code 2004 Edition with 2006 Addenda. The LaSalle County Station, Units 1, and 2 fourth 10-year program interval ends October 11, 2027.

The Limerick Generating Station, Units 1 and 2, Code Edition and Addenda that are applicable to the program interval are the ASME OM Code 2004 Edition, no Addenda. The Limerick Generating Station, Units 1 and 2, current interval ends January 7, 2020.

The Nine Mile Point Nuclear Station, Units 1 and 2, Code Edition and Addenda that are applicable to the program interval are the ASME OM Code 2004 Edition, no Addenda. The Nine Mile Point Nuclear Station, Units 1 and 2, current interval ends December 31, 2018.

The Peach Bottom Atomic Power Station, Units 2 and 3, Code Edition and Addenda that are applicable to the program interval are the ASME OM Code 2001 through 2003 Addenda. The Peach Bottom Atomic Power Station, Units 2 and 3, current interval ends August 27, 2018.

The R.E. Ginna Nuclear Power Plant Code Edition and Addenda that are applicable to the program interval are the ASME OM Code 2004 Edition, no Addenda. The R.E. Ginna Nuclear Power Plant current interval ends December 31, 2019.

Applicable Code Requirement

This request is made in accordance with 10 CFR 50.55a(z)(2), and proposes an alternative to the requirements of 10 CFR 50.55a(f), which requires pumps and valves to meet the test requirements set forth in specific documents incorporated by reference in 10 CFR 50.55a(a). ASME Code Case OMN-20 applies to Division 1, Section IST of the ASME OM Code and associated addenda incorporated by reference in 10 CFR 50.55a(a).

Reason for Request

The IST Program controls specified in Section 5.5, or equivalent, of TS provide: a) a table specifying certain IST frequencies; b) an allowance to apply SR 3.0.2, or equivalent, to inservice tests required by the OM Code and with frequencies of two years or less; c) an allowance to apply SR 3.0.3, or equivalent to inservice tests required by the OM Code; and d) a statement that, "Nothing in the ASME OM Code shall be construed to supersede the requirements of any TS." In Regulatory Issue Summary (RIS) 2012-10, "NRC Staff Position on Applying Surveillance Requirement 3.0.2 and 3.0.3 to Administrative Controls Program Tests," and Enforcement Guidance Memorandum (EGM) 2012-001, "Dispositioning Noncompliance with Administrative Controls Technical Specifications Programmatic Requirements that Extend Test Frequencies and Allow Performance of Missed Tests," the NRC stated that items b, c, and d of the TS IST Program were inappropriately added to the TS and may not be applied (although the EGM allows licensees to continue to apply those paragraphs pending a generic resolution of the issue).

In RIS 2012-10 and EGM 2012-001, the NRC stated that the current TS allowance to apply SR 3.0.2 and SR 3.0.3, or equivalent, to the Inservice Testing Program would no longer be permitted. In response, OMN-20, which provides allowances similar to SR 3.0.2, or equivalent, was approved and is proposed to be used as an alternative to the test periods specified in the OM code. The proposed alternative substitutes an approved Code Case for the existing TS requirements that the NRC has determined are not legally acceptable as a TS allowance. This proposed alternative provides an equivalent level of safety as the existing TS allowance, while maintaining consistency with 10 CFR 50.55a and the ASME OM Code.

Proposed Alternative and Basis for Use

The proposed alternative is OMN-20, "Inservice Test Frequency," which addresses testing periods for pumps and valves specified in ASME OM Division 1, Section IST, 2009 Edition through OMa-2011 Addenda, and all earlier editions and addenda of the ASME OM Code. This request is being made in accordance with 10 CFR 50.55a(z)(2), in that the existing requirements are considered a hardship without a compensating increase in quality and safety for the following reasons:

- 1) For IST testing periods up to and including two years, Code Case OMN-20 provides an allowance to extend the IST testing periods by up to 25%. The period extension is to facilitate test scheduling and considers plant operating conditions that may not be suitable for performance of the required testing (e.g., performance of the test would cause an unacceptable increase in the plant risk profile due to transient conditions or other ongoing surveillance, test or maintenance activities). Period extensions are not intended to be used repeatedly, merely as an operational convenience to extend test intervals beyond those specified. The test period extension and the statements regarding the appropriate use of the period extension are equivalent to the existing TS SR 3.0.2, or equivalent, allowance and the statements regarding its use in the SR 3.0.2, or equivalent, Bases. Use of the SR 3.0.2, or equivalent, period extension has been a practice in the nuclear industry for many decades and elimination of this allowance would place a hardship on Braidwood Station, Units 1 and 2; Clinton Power Station, Unit 1; LaSalle County Station, Units 1 and 2; Limerick Generating Station, Units 1 and 2; Nine Mile Point Nuclear Station, Units 1 and 2; Peach Bottom Atomic Power Station, Units 2 and 3;

and R.E. Ginna Nuclear Power Plant when there is no evidence that the period extensions affects component reliability.

- 2) For IST testing periods of greater than two years, OMN-20 allows an extension of up to six months. The ASME OM Committee determined that such an extension is appropriate. The six-month extension will have a minimal impact on component reliability considering that the most probable result of performing any inservice test is satisfactory verification of the test acceptance criteria. As such, pumps and valves will continue to be adequately assessed for operational readiness when tested in accordance with the requirements specified in 10 CFR 50.55a(f) with the frequency extensions allowed by Code Case OMN-20.
- 3) As stated in EGM 2012-001, if an Inservice Test is not performed within its frequency, SR 3.0.3, or equivalent, will not be applied. The effect of a missed Inservice Test on the Operability of TS equipment will be assessed under the licensee's Operability Determination Program.

Duration of Proposed Alternative

The proposed alternative is requested for the current 10-Year IST interval or until Code Case OMN-20 is incorporated into a future revision of Regulatory Guide 1.192, referenced by a future revision of 10 CFR 50.55a, whichever occurs first.

For LaSalle County Station, Units 1 and 2, the proposed alternative is requested for the current (third) and fourth 10-year program interval, which begins October 12, 2017.

Precedents

The NRC approved the use of OMN-20 for North Anna on March 27, 2014 (ML14084A407); Byron Station, Units 1 and 2, on February 26, 2016 (ML16022A135); Calvert Cliffs Nuclear Power Plant, Units 1 and 2, on September 24, 2014 (ML14247A555); Dresden Nuclear Power Station, Units 2 and 3, on October 31, 2013 (ML13297A515); Quad Cities Nuclear Power Station, Units 1 and 2, on February 13, 2013 (ML13042A348); and Three Mile Island Nuclear Station, Unit 1, on August 15, 2013 (ML13227A024).