

**From:** Alley, David

**Sent:** Friday, May 12, 2017 3:51 PM

**To:** Wrona, David <David.Wrona@nrc.gov>

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**Subject:** Safety Evaluation, Exelon Fleet, UT-RR, UT in Lieu of RT, CAC MF8763, MF8764, MF8765, MF8766, MF8767, MF8768, MF8769, MF8770, MF8771, MF8772, MF8773, MF8774, MF8775, MF8776, MF8777, MF8778, MF8779, MF8780, MF8781, MF8782, MF9395

This document is already in ADAMS as ML17121A049 there are a few changes

This is likely to become a standard SE for many plants. Please do not make any changes to this document other than typos without discussing them with us.

By letter dated November 2, 2016 and amended by letter dated March 13, 2017, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16307A253 and ML17072A385 respectively), Exelon Generation Company, LLC (the licensee), submitted alternative request "Proposed Alternative For the Use of Encoded Phased Array Ultrasonic Examination Techniques in Lieu of Radiography" (UT-RR) to request relief from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) Section XI, Paragraphs IWA-4221 and IWA-4540(a)(2). ASME Code Section XI, Paragraphs IWA-4221 and IWA-4540(a)(2) requires the use of Section III paragraph NC-5200 for repaired and replaced components, which in turn specifies the use of radiographic examinations. The licensee is proposing to use Phased Array Ultrasonic Testing (PAUT) as an alternative to the required radiographic testing.

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(z)(1), the licensee requested to use the proposed alternative on the basis that the alternative would provide an acceptable level of quality and safety.

This email constitutes division of engineering concurrence with the attached safety evaluation

This concludes work by EPNB on CACs MF8763, MF8764, MF8765, MF8766, MF8767, MF8768, MF8769, MF8770, MF8771, MF8772, MF8773, MF8774, MF8775, MF8776, MF8777, MF8778, MF8779, MF8780, MF8781, MF8782, MF9395

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