



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

March 1, 2018

**LICENSEE:** EXELON GENERATION COMPANY, LLC

**FACILITIES:** CLINTON POWER STATION, UNIT NO. 1; DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3; JAMES A. FITZPATRICK NUCLEAR POWER PLANT; LASALLE COUNTY STATION, UNITS 1 AND 2; NINE MILE POINT NUCLEAR STATION, UNITS 1 AND 2; OYSTER CREEK NUCLEAR GENERATING STATION; AND QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2

**SUBJECT:** SUMMARY OF FEBRUARY 26, 2018, MEETING WITH EXELON GENERATION COMPANY, LLC REGARDING PROPOSED ALTERNATIVE TO THE MAIN STEAM ISOLATION VALVE TESTING REQUIREMENTS (EPID L-2017-LLR-0134)

On February 26, 2018, a Category 1 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Exelon Generation Company, LLC (Exelon, the licensee) via teleconference. The purpose of the meeting was to discuss Exelon's November 1, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17306A014), application for a proposed alternative to a portion of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code). The proposed alternative was requested for Clinton Power Station, Unit No. 1; Dresden Nuclear Power Station, Units 2 and 3; James A. FitzPatrick Nuclear Power Plant; LaSalle County Station, Units 1 and 2; Nine Mile Point Nuclear Station, Units 1 and 2; Oyster Creek Nuclear Generating Station; and Quad Cities Nuclear Power Station, Units 1 and 2. The meeting notice and agenda, dated February 12, 2018, are available in ADAMS at Accession No. ML18043A631. A list of attendees is enclosed.

### **Background**

Currently, Exelon performs partial-stroke testing of the main steam isolation valves (MSIVs) quarterly and full-stroke testing of the MSIVs during cold shutdown based on a cold shutdown justification (CSJ). Paragraph ISTC-3521(b) of the ASME OM Code states that if full-stroke exercising of a valve during operation at power is not practicable, it may be limited to partial stroke during operation at power and full-stroke during cold shutdown. Exelon's application states that it will revise its CSJ to eliminate the quarterly partial-stroke testing of MSIVs at power, such that the only exercising of MSIVs will be the full-stroke testing during cold shutdown. Paragraph ISTC-3521(c) of the ASME OM Code states that if exercising of a valve during operation power is not practicable, it may be limited to full-stroke exercising during cold shutdown.

Exelon also performs a quarterly reactor protection system (RPS) channel functional test (a surveillance requirement) that uses the partial-stroke of the MSIV to generate the MSIV position switch input into the RPS logic. Exelon's application states that it will use the surveillance frequency control program to extend the RPS channel functional test to refueling outage intervals. In order to accomplish this change, the application stated that the partial-stroking of the MSIVs at power would need to continue for a number of years at longer intervals (i.e., less frequent than the current quarterly testing).

### **Discussion**

Exelon's application indicated that a proposed alternative to the ASME OM Code was needed because continuing to perform periodic partial-stroke MSIV testing at power will contradict a CSJ that exercising at power is not practicable. Exelon also cited a past precedent for this request, which the NRC authorized for Peach Bottom Atomic Power Station (Peach Bottom), Units 2 and 3, by letter dated April 28, 2017 (ADAMS Accession No. ML17108A762).

The NRC staff stated that the alternative was not needed, since the ASME OM Code does not prevent the continued exercising of MSIVs at power if a CSJ demonstrates that exercising at power is not practicable. In particular, the staff notes that paragraph ISTC-3521(c) of the ASME OM Code states that exercising "may"—not "shall"—be limited to full-stroke exercising during cold shutdown. Thus, paragraph ISTC-3521(c) does not prevent the partial-stroke testing of the MSIVs at power. The staff notes it has not reviewed Exelon's revised CSJ.

Exelon did not identify anything that was missing in its application that would indicate the need for the proposed alternative. Exelon did express some concern about the past precedent for Peach Bottom. However, the NRC staff noted that it considered the precedent in its review of the current proposed alternative. The staff stated that the licensee should not be impacted by the previous NRC authorization for Peach Bottom, because implementation of alternatives to the ASME OM Code is optional.

Exelon stated that it will withdraw its application, and it will include the information discussed at this meeting. After the withdrawal letter is received, the NRC staff will respond with an acknowledgement letter confirming the staff's position.

Public meeting feedback forms were not received. Please direct any inquiries to me at 301-415-1380, or [Blake.Purnell@nrc.gov](mailto:Blake.Purnell@nrc.gov).

A handwritten signature in black ink, appearing to read 'B. Purnell', is positioned above the typed name.

Blake Purnell, Project Manager  
Plant Licensing Branch III  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-461, 50-237, 50-249, 50-333  
50-373, 50-374, 50-220, 50-410,  
50-219, 50-254, and 50-265

Enclosure:  
List of Attendees

cc w/encl: Listserv  
[marvlewis@juno.com](mailto:marvlewis@juno.com)

LIST OF ATTENDEES

FEBRUARY 26, 2018, MEETING WITH

EXELON GENERATION COMPANY, LLC

PROPOSED ALTERNATIVE TO THE MAIN STEAM ISOLATION VALVE

TESTING REQUIREMENTS

<b>Name</b>	<b>Affiliation</b>
Blake Purnell	NRC
David Wrona	NRC
John Huang	NRC
Robert Wolfgang	NRC
Bhalchandra Vaidya	NRC
Tom Basso	Exelon
James Barstow	Exelon
Mark DiRado	Exelon
Bill Reynolds	Exelon
David Helker	Exelon
Marcellus Ruff	Exelon
Phil Kehoe	Exelon
John Pilon	Exelon
David Neff	Exelon
Gary Knapp	Exelon
Mark Budelier	Exelon
Greg Krueger	Exelon/NEI Representative

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- RidsNrrPMNineMilePoint Resource
- RidsNrrPMOysterCreek Resource
- RidsNrrPMPeachBottom Resource
- RidsNrrPMQuadCities Resource
- RidsNrrLASRohrer Resource
- RidsNrrDeEmib Resource
- TWertz, NRR
- JBowen, EDO
- JHuang, NRR
- RWolfgang, NRR
- BVaiyda, NRR

**ADAMS Accession Nos. Meeting Notice ML18043A631 Meeting Summary ML18058A523**

OFFICE	NRR/DORL/LPL3/PM	NRR/DORL/LPL3/LA	NRR/DORL/LPL3/BC	NRR/DORL/LPL3/PM
NAME	BPurnell	SRohrer	DWrona	BPurnell
DATE	3/1/18	2/27/18	3/1/18	3/1/18

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