



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

April 16, 2018

Mr. Bryan C. Hanson
Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Officer (CNO)
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: 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—WITHDRAWAL OF PROPOSED ALTERNATIVE TO THE MAIN STEAM ISOLATION VALVE TESTING REQUIREMENTS (EPID L-2017-LLR-0134)

Dear Mr. Hanson:

By application dated November 1, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17306A014), Exelon Generation Company, LLC (the licensee) submitted a request in accordance with Paragraph 50.55a(z)(1) of Title 10 of the *Code of Federal Regulations* (10 CFR) for a proposed alternative to the requirements of 10 CFR 50.55a, "Codes and standards," and the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) at 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 proposed alternative was intended to allow the licensee to eliminate the quarterly partial-stroke exercise testing of the main steam isolation valves (MSIVs) for each of these facilities. By letter dated March 27, 2018 (ADAMS Accession No. ML18086B221), the licensee requested to withdraw its November 1, 2017, application because the licensee has concluded that the proposed alternative is not needed.

Currently, the licensee performs partial-stroke testing of the 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. The application stated that the licensee 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 at power is not practicable, it "may" be limited to full-stroke exercising during cold shutdown.

The licensee 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. The application stated that the licensee 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).

The application indicated that the licensee's 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. However, 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 prohibit the partial-stroke testing of the MSIVs at power. This fact was discussed with the licensee during a public teleconference held on February 26, 2018 (ADAMS Accession No. ML18058A523). Based on this, the licensee has concluded that the proposed alternative is not needed and has requested to withdraw its November 1, 2017, application.

This letter acknowledges that the licensee has withdrawn its November 1, 2017, application. If you have any questions, please contact Blake Purnell at 301-415-1380 or via e-mail at Blake.Purnell@nrc.gov.

Sincerely,



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

cc: ListServ

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