

**From:** [Sreenivas, V](#)  
**To:** [Loomis, Thomas R:\(GenCo-Nuc\) \(thomas.loomis@exeloncorp.com\)](#); [Stewart, Glenn H:\(GenCo-Nuc\) \(Glenn.Stewart@exeloncorp.com\)](#)  
**Cc:** [Danna, James](#); [Ruffin, Steve](#); [Danna, James](#); [Cumblidge, Stephen](#)  
**Subject:** Limerick: Relief request (RR) I3R-23 to request relief from the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), EPID: L-2017-LLR-0098  
**Date:** Tuesday, May 15, 2018 2:48:00 PM

---

By letter dated September 29, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17275A202), Exelon Generation Company, LLC (Exelon, the licensee), submitted relief request (RR) I3R-23 to request relief from the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," 2001 Edition through 2003 Addenda, regarding the examination of welds, nozzle inside radius sections, and supports at Limerick Generating Station, Units 1 and 2 (LGS). Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(g)(5)(iii), the licensee requested relief for the Third 10-year In-service Inspection (ISI) Interval items on the basis that the ASME Code requirement is impractical.

In the RR, the D ESW Pump Upper and Lower Seismic Restraints and the A RHRSW Pump Upper and Lower Seismic Restraints were included as examination requirements deemed impractical with limited inspection coverage due to the spray pond water clarity. The NRC staff has previously granted relief requests for impracticality when IST or ISI was impossible due to design features, the inspection requiring major plant or hardware redesign or modification, or when existing technology will not give meaningful results. Based on the guidance in LIC-102, Revision 2 "Relief Request Reviews" (ADAMS Accession No. ML091380595), other possible justifications for impracticality include the inspection having high potential to cause a reactor trip, that the inspection could cause system or component damage, or that the inspection would require replacing equipment or in-line components. The NRC staff has not found any precedent for granting a relief request under 10 CFR 50.55a(g)(6)(i) for water clarity or surface corrosion on a component.

Based on the information provided in the letter dated September 29, 2017, it is not apparent to the staff that it is not possible to perform a VT-3 examination on the Seismic Restraints without plant modifications or the development of new technology. For example, the restraints could likely be examined by either temporarily draining the water or through the use of remote visual testing using cameras and lights.

The NRC staff has reviewed the information provided by the licensee in the RR. The following additional information is needed to complete our review of the RR.

The steps described in Relief Request I3R-23 appear to be temporary modifications, which do not reach the threshold for impracticality. Please provide explanation or justification regarding why it would be impractical to perform VT-3 examination by any other means not requiring significant modifications or the development of new technology.

Please submit your responses to this RAI by June 13, 2018. If you have any questions, please contact me.

---

[V. Sreenivas, Ph.D., C.P.M.](#)  
[Licensing Project Manager](#)  
[Limerick and Ginna, Plant Licensing Branch I](#)  
[Division of Operating Reactor Licensing](#)  
[Office of Nuclear Reactor Regulation](#)

