



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

December 10, 2018

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

SUBJECT: NINE MILE POINT NUCLEAR STATION, UNITS 1 AND 2 – ISSUANCE OF RELIEF REQUEST RE: USE OF ASME CODE CASE OMN-13 IN LIEU OF SPECIFIC ASME CODE REQUIREMENTS (EPID L-2018-LLR-0052)

Dear Mr. Hanson:

By letter dated April 10, 2018 (Agencywide Documents Access and Management System Accession No. ML18100A299), Exelon Generation Company, LLC (the licensee) submitted an alternative to the requirements of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) associated with snubber examination at the Nine Mile Point Nuclear Station, Units 1 and 2 (Nine Mile Point 1 and 2). This request was submitted for the fifth and fourth 10-year inservice testing intervals at Nine Mile Point 1 and 2, respectively, and is applicable to all snubbers within the scope of the Nine Mile Point 1 and 2 snubber programs.

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a(z)(1), the licensee requested to use the proposed alternative on the basis that the alternative provides an acceptable level of quality and safety. The fifth and fourth 10-year intervals for Nine Mile Point, Units 1 and 2, will begin on January 1, 2019, and are currently scheduled to conclude on December 31, 2028.

The U.S. Nuclear Regulatory Commission staff has reviewed the subject request and concludes, as set forth in the enclosed safety evaluation, that the alternative proposed by the licensee will ensure an acceptable level of quality and safety for the snubbers is maintained and the alternative has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(z)(1). Therefore, pursuant to 10 CFR 50.55a(z)(1), the licensee's proposed alternative is authorized for the fifth and fourth 10-year inservice testing intervals at Nine Mile Point 1 and 2, respectively.

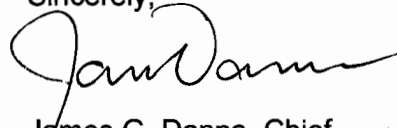
All other ASME OM Code requirements for which relief was not specifically requested and approved in the subject request for relief remain applicable.

B. Hanson

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If you have any questions, please contact Jennifer Tobin by telephone at 301-415-2328 or by e-mail to Jennifer.Tobin@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "James G. Danna". The signature is fluid and cursive, with a long horizontal stroke at the end.

James G. Danna, Chief
Plant Licensing Branch 1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-220 and 50-410

Enclosure:
Safety Evaluation

cc: Listserv



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

ALTERNATIVE REQUEST SR-1 – SNUBBER INSPECTION AND TESTING

EXELON GENERATION COMPANY, LLC

NINE MILE POINT NUCLEAR STATION, UNITS 1 AND 2

DOCKET NOS. 50-220 AND 50-410

1.0 INTRODUCTION

By letter dated April 10, 2018 (Agencywide Documents Access and Management System Accession No. ML18100A299), Exelon Generation Company, LLC (the licensee) submitted an alternative to the requirements of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) associated with snubber examination at the Nine Mile Point Nuclear Station, Units 1 and 2 (Nine Mile Point 1 and 2). The request was submitted for the fifth and fourth 10-year inservice testing (IST) intervals at Nine Mile Point 1 and 2, respectively, and is applicable to the snubber examination requirements of the ASME OM Code for all snubbers within the scope of the Nine Mile Point 1 and 2 snubber programs. Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a(z)(1), the licensee requested to use the proposed alternative on the basis that the alternative provides an acceptable level of quality and safety.

2.0 REGULATORY EVALUATION

The IST of ASME Code Class 1, 2, and 3 components is to be performed in accordance with certain provisions of ASME OM Code and applicable edition and addenda as required by 10 CFR 50.55a(f). Pursuant to 10 CFR 50.55a(z), alternatives to the requirements of paragraph (f) may be used when authorized by the NRC if: (1) the proposed alternatives would provide an acceptable level of quality and safety, or (2) compliance with the specified requirements would result in hardship or unusual difficulty, without a compensating increase in the level of quality and safety.

Pursuant to 10 CFR 50.55a(f)(4), pumps and valves within the scope of the ASME OM Code must meet the inservice test requirements, except the design and access provisions set forth in the ASME OM Code, to the extent practical within the limitations of design, geometry, and materials of construction of the components. The regulations require that inservice examination of components and system pressure tests conducted during the first 10-year IST interval and subsequent intervals comply with the requirements in the latest edition and addenda of Section XI of the ASME Code incorporated by reference in 10 CFR 50.55a(a)(1)(ii), 12 months prior to the start of the 120-month interval, subject to the conditions listed in 10 CFR 50.55a(b)(3).

Nine Mile Point 1 is currently in the fourth 10-year IST interval. The fifth interval will begin on January 1, 2019, and is scheduled to end on December 31, 2028. Nine Mile Point 2 is currently in the third 10-year IST interval. The fourth interval will begin on January 1, 2019, and is scheduled to end on December 31, 2028.

3.0 TECHNICAL EVALUATION

3.1 Background

The licensee requested an alternative to the snubber examination requirements of the ASME OM Code for all snubbers within the scope of the Nine Mile Point 1 and 2 snubber programs.

3.2 ASME Code Requirements

The ASME OM Code requires certain snubber examination frequencies as identified below:

- ISTD-4252, "Subsequent Examination Intervals," (c), states, "The duration of examination intervals following the completion of the second refueling outage shall be in accordance with Table ISTD 4252 1."
- ISTA-3130, "Application of Code Cases," (b), states, "Code Cases shall be applicable to the edition and addenda specified in the test plan."
- ASME OM Code Case OMN-13, Revision 2, "Performance-Based Requirements for Extending Snubber Inservice Visual Examination Interval at LWR Power Plants."

3.3 Applicable ASME Code Edition and Addenda

The applicable ASME OM Code edition and addenda for Nine Mile Point 1 and 2 fifth and fourth 10-year IST intervals, respectively, is the 2012 Edition with no Addenda.

3.4 Licensee's Proposed Alternative

In its April 10, 2018, letter, the licensee stated:

ISTA-3130(b) states, "Code Cases shall be applicable to the edition and addenda specified in the test plan." ASME has approved CC [Code Case] OMN-13 ["Performance-Based Requirements for Extending Snubber Inservice Visual Examination Interval at LWR Power Plants"], Revision 2. This CC is unconditionally approved for use in Regulatory Guide (RG) 1.192, Operation and Maintenance Code Case Acceptability, ASME OM Code, Revision 2. The NMPNS [Nine Mile Point Nuclear Station] code of record for the 5th interval for Unit 1 and the 4th interval for Unit 2 is the ASME OM-2012 Edition. However, CC OMN-13, Revision 2, states in the Applicability section that it is applicable to ASME OM Code 1995 Edition through 2011 Addenda. NMPNS will be implementing the ASME Code OM-2012 Edition and proposes to also implement CC OMN-13, Revision 2, for extending the examination interval for snubbers.

3.6 Licensee's Basis for Use of Alternative

The licensee proposed to use ASME OM Code Case OMN-13, Revision 2, with the 2012 Edition of the ASME OM Code in lieu of the 1995 Edition through 2011 Addenda of the ASME OM Code, as stated in the applicability section of Code Case OMN-13, Revision 2. The proposed alternative will be utilized for the fifth IST 10-year interval for Nine Mile Point 1, and the fourth IST 10-year interval for Nine Mile Point 2, which are both currently scheduled to start on January 1, 2019.

3.7 Duration of Proposed Alternative

The licensee submitted this request for the fifth and fourth IST intervals for the Nine Mile Point 1 and 2, respectively. The fifth and fourth IST intervals are scheduled to begin January 1, 2019, and conclude on December 31, 2028.

4.0 NRC STAFF EVALUATION

The NRC staff reviewed the information provided by the licensee in its submittal regarding its proposed alternative to the ASME OM Code and the technical basis for the licensee's proposed alternative. The 2012 Edition of the ASME OM Code, Section ISTD-4252(c), requires snubber examination intervals following the second refueling outage to be in accordance with intervals specified in Table ISTD-4252-1. The snubber visual examination interval can be extended up to 48 months by meeting the requirements as specified in Table ISTD-4252-1 and its notes. ASME OM Code Case OMN-13, Revision 2, allows extension of the visual examination interval beyond the interval allowed in Table ISTD-4252-1. ISTD-3130(b) requires that Code cases shall be applicable to the edition and addenda specified in the test plan. The licensee proposed to use ASME OM Code Case OMN-13, Revision 2, to extend the visual examination interval beyond the interval allowed by Table ISTD-4252-1 for all snubbers in the IST program. Specifically, the licensee proposed to apply ASME OM Code Case OMN-13, Revision 2, to the 2012 Edition of the ASME OM Code in lieu of the 1995 Edition through 2011 Edition, to extend the visual inspection frequency of snubbers in the IST program.

Application of ASME OM Code cases is addressed in 10 CFR 50.55a(b)(6) through references to NRC Regulatory Guide 1.192, Revision 2, "Operation and Maintenance Code Case Acceptability, ASME OM Code," which lists acceptable and conditionally acceptable Code cases for implementation in the IST program and snubber program. Code Case OMN-13, Revision 2, is in Table 1 of Regulatory Guide 1.192, Revision 2, which means that it is acceptable for use without conditions. Code Case OMN-13, Revision 2, was published with the 2012 Edition of the ASME OM Code, and is applicable to the 1995 Edition through the 2011 Addenda of the ASME OM Code. There is no technical reason for prohibiting the use of Code Case OMN-13, Revision 2, with the 2012 Edition of the ASME OM Code. Further, NRC staff review of the 2012 Edition of the ASME OM Code and Code Case OMN-13, Revision 2, confirmed that there are no changes in the applicable Code sections referenced within Code Case OMN-13, Revision 2. Therefore, the NRC staff concludes that the licensee's proposed alternative provides an acceptable level of quality and safety.

5.0 CONCLUSION

As set forth above, the NRC staff concludes that the licensee's proposed alternative to extend the examination interval for the snubbers included in the ASME OM Code provides an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(z)(1), the licensee's proposed alternative is authorized for the fifth and fourth 10-year IST intervals at Nine Mile Point 1 and 2, respectively.

All other ASME OM Code requirements for which relief was not specifically requested and approved in the subject request for relief remain applicable.

Principal Contributor: G. Bedi

Date: December 10, 2018

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