

10 CFR 50.55a

June 26, 2019

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

R. E. Ginna Nuclear Power Plant  
Renewed Facility Operating License No. DPR-18  
NRC Docket No. 50-244

Subject: Relief Request Associated with Snubber Inservice Testing Program for the Sixth Ten-Year Interval

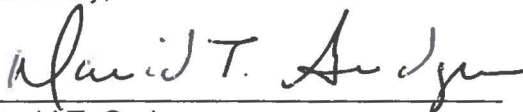
In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (z)(1), Exelon Generation Company, LLC (Exelon) requests your review and approval of the attached relief requests associated with the Inservice Testing (IST) Program for the R. E. Ginna Nuclear Power Plant (Ginna). Exelon is requesting approval of this relief request for the sixth ten-year IST interval which is currently scheduled to start on January 1, 2020.

We request approval of this relief request by December 20, 2019.

There are no regulatory commitments contained within this letter.

If you have any questions concerning this letter, please contact Mr. David Neff at (267) 533-1132.

Sincerely,



David T. Gudger  
Manager - Licensing & Regulatory Affairs  
Exelon Generation Company, LLC

Attachment: Snubber IST Program - Relief Request for R. E. Ginna Nuclear Power Plant

cc: USNRC Region I, Regional Administrator  
USNRC Project Manager, Ginna  
USNRC Senior Resident Inspector, Ginna  
A. L. Peterson, NYSERDA

EXELON GENERATION COMPANY, LLC  
SNUBBER IST PROGRAM – RELIEF REQUEST  
R. E. Ginna Nuclear Power Plant

Proposed Alternative in accordance with 10 CFR 50.55a(z)(1)  
SR-1 – Snubber Inspection and Testing

**1. Component(s) Affected:**

All snubbers within the scope of the R. E. Ginna Nuclear Power Plant (Ginna) Snubber Program.

**2. Applicable Code Edition and Addenda:**

American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) 2012 Edition with no Addenda.

**3. Applicable Code Requirement(s):**

ISTA-3130, Application of Code Cases, subparagraph (b), states, “Code Cases shall be applicable to the edition and addenda specified in the test plan.”

**4. Reason for Request:**

Pursuant to 10 CFR 50.55a, *Codes and standards*, paragraph (z)(1), an alternative is proposed to ISTA-3130(b) requirements for implementing Code Case (CC) OMN-13, *Performance-Based Requirements for Extending Snubber Inservice Visual Examination Interval at LWR Power Plants*, Revision 2. The basis of the request is that the proposed alternative will provide an acceptable level of quality and safety.

ISTA-3130(b) states, “Code Cases shall be applicable to the edition and addenda specified in the test plan.” ASME has approved CC OMN-13, 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 Ginna code of record for the 6<sup>th</sup> ten-year Inservice Test (IST) Program interval 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. Ginna will be implementing the ASME OM Code 2012 Edition and also proposes to implement CC OMN-13, Revision 2, for snubbers.

Ginna used CC OMN-13, Revision 0, during the previous ten-year Inservice Inspection (ISI) Program Interval and proposes to continue with Revision 2 of this CC for the subsequent ten-year IST Program interval. Based on the required update of the ISI program and 10 CFR 50.55a(b)(3)(v), OM Condition: Snubbers ISTD, item (B) *Snubbers: Second Provision*, the requirements for snubbers are moving from ASME Section XI to the OM Code; therefore, this CC OMN-13 request is associated with the next Snubber ten-year IST Program interval.

**5. Proposed Alternative and Basis for Use:**

The proposed alternative to ISTA-3130(b) is requested to implement this CC since the CC Applicability statement covers only the 1995 Edition through the 2011 Addenda and ISTA-3130(b) requires applicability to the edition specified in the test plan, which would be the ASME OM-2012 Edition. A review of the 2012 Edition of the OM Code and CC OMN-13,

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Revision 2, confirmed that there are no changes in the applicable Code sections referenced within the CC when comparing the 2011 Addenda to the 2012 Edition.

RG 1.192, Revision 2, Table 1, *Acceptable OM Code Cases*, lists CC OMN-13, Revision 2 (2012 Edition) as acceptable to the NRC for application in a licensee's IST program without conditions.

Using the provisions of this request as an alternative to the requirements of ISTA-3130(b) will provide adequate detection of observable snubber degradation and, along with the testing and service life monitoring requirements of Subsection ISTD, will continue to provide reasonable assurance of the operational readiness of Ginna snubbers. Therefore, the proposed alternative provides an acceptable level of quality and safety pursuant to 10 CFR 50.55a(z)(1).

**6. Duration of Proposed Alternative:**

The proposed alternative, upon approval, shall be utilized during the Ginna 6<sup>th</sup> ten-year IST Program interval, which begins January 1, 2020, and is scheduled to end on December 31, 2029.

**7. Precedent:**

1. 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), dated December 10, 2018 (ML18318A422).

**8. References:**

1. Code Case OMN-13, Performance-Based Requirements for Extending Snubber Inservice Visual Examination Interval at LWR Power Plants, Revision 2.
2. RG 1.192, Operation and Maintenance Code Case Acceptability, ASME OM Code, Revision 2, dated March 2017; published January 2018 (ML16321A337).