

Ronewicz, Lynn

From: Sreenivas, V
Sent: Thursday, May 28, 2020 5:21 PM
To: Neff, David B:(Exelon Nuclear)
Cc: Danna, James; Bedi, Gurjendra; Buford, Angela
Subject: LIMERICK GENERATING STATION, UNITS 1 AND 2: RAI FOR LAR TO USE INSERVICE TESTING PROGRAM SAFETY RELIEF VALVE TESTING EPID No. L-2020-LLA-0052

In its submittal dated February 5, 2020 (ADAMS Accession No. ML20036D488), the licensee provides the proposed LAR in accordance with 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit." The licensee proposed to modify the TS SRs for the testing of the SRVs to retain the frequency and certain testing requirements in accordance with IST Program. These changes are in accordance with the previously NRC approved LAR related to TSTF-545 (ADAMS Accession No. ML17103A081).

Upon review, the NRC staff requests the licensee that the additional information is needed to complete its review related to the application under the EPID No. L-2020-LLA-0052. Please find the following:

RAI EMIB-LAR-1

Attachment 1 of the submitted LAR provides the proposed changes mark-up for Specification 4.4.2.2. The licensee's proposed changes for TS Section are as below:

4.4.2.2 ~~At least 1/2 of the safety relief valves shall be removed, set pressure tested and reinstalled or replaced with spares that have been previously set pressure tested and stored in accordance with manufacturer's recommendation in accordance with the Surveillance Frequency Control Program, and they shall be rotated such that all 14 safety related valves are removed, set pressure tested and reinstalled and replace with spares that have been previously set pressure tested and stored in accordance with manufacturer's recommendation in accordance with the Surveillance Frequency Control Program.~~ All safety valves will be recertification tested to meet a $\pm 1\%$ tolerance prior to returning the valves to service.

Verify the specified code safety valve function lift setting of each of the 14 safety/relief valves in accordance with Specification 4.0.5.

The NRC staff requests the following information regarding the proposed TS change:

- (a) Please clarify the prefix "code" used with the "safety valve function" in the proposed mark-up.
- (b) Specification 4.0.5 contains (1) inservice testing program, and (2) inservice inspection program. During the review process, the NRC staff observed that in the licensee's submittal for TSTF-545 (ADAMS No. ML16210A227), the TS bases in Specification 4.0.5 needs to be verified by the licensee. Specification 4.0.5 states that that it establishes the requirement that inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME *Boiler and Pressure Vessel Code* and Addenda, and the ASME Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code) and applicable Addenda as required by 10 CFR 50.55a. Please clarify the reference to Specification 4.0.5 in the proposed mark-up.

References:

1. In a submittal dated February 5, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20036E488), Exelon Generation Company, LLC (licensee) submitted a license amendment request (LAR) for approval by the U.S. Nuclear Regulatory Commission (NRC), for Limerick Units 1 and 2. The proposed amendment to the Technical Specification (TS) is to retain the TS surveillance requirements (SRs) for the testing of the Safety/Relief Valves (SRVs) frequency and certain testing requirements only in inservice testing (IST) program.
2. NRC Letter to Exelon, "Limerick Generating Station, Units 1 and 2 - Issuance of Amendments to Adopt Technical Specifications Task Force (TSTF) Traveler TSTF-545," dated May 16, 2017 (ADAMS Accession No. ML 17103A081).
3. The following sections of the current Limerick Units 1 and 2, Technical Specifications, are provided for reference:

Definition of IST is provided in TS during implementation of TSTF-545, as follows:

INSERVICE TESTING PROGRAM

1.16a The INSERVICE TESTING PROGRAM is the licensee program that fulfills the requirements of 10 CFR 50.55a(f).

Specification 4.0.5 Inservice Inspection and Inservice Testing Program

The INSEVICE TESTING PROGRSM is the licensee program that fulfills the requirements of 10 CFR 50.55a(f). The Inservice Inspection Program is the licensee program that fulfils the requirements of 10 CFR 50.55a(g).

The provisions of SR 4.0.2 and SR 4.0.3 do not apply to the INSERVICE TESTING PROGRAM unless there is specific SR referencing usage of the program.

Please submit the response no later than June 29, 2020. If you have any questions, please contact me.

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