

VERBAL AUTHORIZATION BY THE NRC OFFICE OF NUCLEAR REACTOR REGULATION FOR
10 CFR 50.55a ALTERNATIVE REQUEST
POSITION VERIFICATION TESTING EXTENSION
EXELON GENERATION
R. E. GINNA NUCLEAR POWER PLANT
DOCKET NO. 50-244
EPID NO. L-2021-LLR-0027

APRIL 26, 2021

Technical Evaluation read by Angela Buford, Chief, Mechanical Engineering and Inservice Testing Branch, Division of Engineering and External Hazards, NRC Office of Nuclear Reactor Regulation

By letter dated April 12, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21102A260), as supplemented by a revision dated April 19, 2021 (ADAMS Accession No. ML21109A209), Exelon Generation (the licensee) proposed to the U.S. Nuclear Regulatory Commission (NRC) an alternative to specific Inservice Testing (IST) Program requirements in the American Society of Mechanical Engineers (ASME) *Operation and Maintenance of Nuclear Power Plants*, Division 1, OM Code: Section IST (OM Code), 2012 Edition, for R. E. Ginna Nuclear Power Plant (Ginna), pursuant to Title 10 of the *Code of Federal Regulations*, Part 50, Section 55a (10 CFR 50.55a).

In particular, the licensee submitted a 10 CFR 50.55a alternative request for NRC authorization of a one-time extension of eight months (to December 28, 2021) for position verification testing of 15 valves at Ginna listed in the request to allow the testing to be performed during the next refueling outage, which is scheduled to begin on October 4, 2021. The NRC staff's evaluation described in this Verbal Authorization applies only to the 15 valves at Ginna listed in the submittal dated April 12, 2021, as supplemented by a revision dated April 19, 2021.

ASME OM Code (2012 Edition), Subsection ISTC, "Inservice Testing of Valves in Light-Water Reactor Nuclear Power Plants," paragraph ISTC-3700, "Position Verification Testing," as incorporated by reference in 10 CFR 50.55a and supplemented by 10 CFR 50.55a(b)(3)(xi), "OM Condition: Valve Position Indication," requires that valves with remote position indication be exercised in the open and closed directions to verify valve obturator position every 2 years. The NRC regulations in 10 CFR 50.55a(z) state, in part, that alternatives to the requirements of 10 CFR 50.55a(f) may be used, when authorized by the NRC, if the licensee demonstrates (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.

In its submittal dated April 12, 2021, as supplemented by a revision dated April 19, 2021, the licensee proposed that compliance with the provisions in ASME OM Code, Subsection ISTC, paragraph ISTC-3700, as incorporated by reference in 10 CFR 50.55a and supplemented by 10 CFR 50.55a(b)(3)(xi), to perform obturator position testing of specific valves during the spring 2021 at Ginna would result in a hardship without a compensating increase in the level of quality and safety in accordance with 10 CFR 50.55a(z)(2). Although the licensee submitted its request under 10 CFR 50.55a(z)(2), the staff evaluated this alternative request under 10 CFR 50.55a(z)(1) consistent with review precedent.

In its request dated April 12, 2021, the licensee stated that the 15 valves listed in the submittal have demonstrated exceptional performance and reliability, and have satisfactorily passed their IST tests for

the past 10 years. Additionally, the licensee indicated that these valves have no history of stem-disk separation. In its revised submittal dated April 19, 2021, the licensee provided additional information regarding the specific tests or operations that have been performed on the individual valves listed in its submittal to provide confidence in the open or closed obturator positions.

Based on the information provided for the 15 valves at Ginna identified in the licensee's request, the NRC staff finds that (1) previous testing of these valves indicates their acceptable historical performance; (2) no current concerns with the performance of these valves have been identified; (3) periodic maintenance activities are not modified by this request; and (4) the alternative provides an acceptable level of quality and safety for the short extension of the valve position indication testing interval requested in the licensee's submittal.

Therefore, the NRC staff finds that the licensee's proposed alternative for a one-time extension of eight months for the required obturator position verification testing interval for the 15 specified valves at Ginna listed in the licensee's submittal will provide an acceptable level of quality and safety until the next refueling outage, scheduled for October 2021. Thus, the NRC staff concludes that the licensee has adequately addressed the regulatory requirements set forth in 10 CFR 50.55a(z)(1). All other ASME OM Code requirements as incorporated by reference in 10 CFR 50.55a for which relief or an alternative was not specifically requested and approved in this request dated April 12, 2021, as supplemented by a revision dated April 19, 2021, remain applicable. If the licensee identifies a performance issue with any of these valves, the licensee will be expected to take action to implement the requirements of its Technical Specifications. This authorization will remain in effect until restart from the next refueling outage for Ginna, scheduled for October 2021. The licensee's obturator position verification testing plans for these valves may be adjusted as appropriate by any subsequent NRC-authorized alternative requests.

Authorization read by Jennifer Tobin, Acting Chief of the Plant Licensing Branch 1, Office of Nuclear Reactor Regulation, NRC

As Acting Chief of the Plant Licensing Branch 1, Office of Nuclear Reactor Regulation, I agree with the conclusions of the Mechanical Engineering and Inservice Testing Branch.

The NRC staff concludes that the licensee's proposed alternative for Ginna will provide reasonable assurance of adequate safety until the next refueling outage, scheduled for October 2021, when position verification testing for the 15 specific valves will be performed.

The NRC staff finds that the licensee's proposed alternative to extend the valve position verification testing interval for the specified 15 valves at Ginna required by the ASME OM Code, Subsection ISTC, as supplemented by 10 CFR 50.55a(b)(3)(xi), provides an acceptable level of quality and safety. Accordingly, the NRC staff concludes that the licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(z)(1).

Therefore, effective April 26, 2021, the NRC authorizes a one-time extension of the interval for ASME OM Code position indication testing as supplemented by 10 CFR 50.55a(b)(3)(xi), until completion of the next refueling outage, scheduled for October 2021. All other requirements in ASME OM Code for which relief or an alternative was not specifically requested and approved in this alternative request remain applicable.

This verbal authorization does not preclude the NRC staff from asking additional clarification questions regarding this alternative request while subsequently preparing the written safety evaluation.