

RS-21-081  
NMP1L3420

August 5, 2021

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

Braidwood Station, Units 1 and 2  
Renewed Facility Operating License Nos. NPF-72 and NPF-77  
NRC Docket Nos. STN 50-456 and STN 50-457

Calvert Cliffs Nuclear Power Plant, Units 1 and 2  
Renewed Facility Operating License Nos. DPR-53 and DPR-69  
NRC Docket Nos. 50-317 and 50-318

Clinton Power Station, Unit 1  
Facility Operating License No. NPF-62  
NRC Docket No. 50-461

Limerick Generating Station, Units 1 and 2  
Renewed Facility Operating License Nos. NPF-39 and NPF-85  
NRC Docket Nos. 50-352 and 50-353

Nine Mile Point Nuclear Station, Units 1 and 2  
Renewed Facility Operating License Nos. DPR-63 and NPF-69  
NRC Docket Nos. 50-220 and 50-410

Peach Bottom Atomic Power Station, Units 2 and 3  
Renewed Facility Operating License Nos. DPR-44 and DPR-56  
NRC Docket Nos. 50-277 and 50-278

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

Subject: Proposed Alternative to Implement Code Case OMN-28, "Alternative Valve Position Verification Approach to Satisfy ISTC-3700 for Valves Not Susceptible to Stem-Disk Separation"

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (z)(1), Exelon Generation Company, LLC (Exelon), requests NRC approval of a proposed relief request associated with the use of ASME Code Case OMN-28, "Alternative Valve Position Verification Approach to Satisfy ISTC-3700 for Valves Not Susceptible to Stem-Disk Separation."

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Exelon requests your review and approval of this request by October 4, 2021.

There are no regulatory commitments contained in this letter.

If you have any questions, please contact Tom Loomis at 610-765-5510.

Respectfully,

*David T. Gudger*

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

Attachment: Relief Request to Utilize Code Case OMN-28, "Alternative Valve Position  
Verification Approach to Satisfy ISTC-3700 for Valves Not Susceptible to Stem-  
Disk Separation"

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cc: Regional Administrator - NRC Region I  
Regional Administrator - NRC Region III  
NRC Senior Resident Inspector - Braidwood Station  
NRC Senior Resident Inspector - Calvert Cliffs Nuclear Power Plant  
NRC Senior Resident Inspector - Clinton Power Station  
NRC Senior Resident Inspector - Limerick Generating Station  
NRC Senior Resident Inspector - Nine Mile Point Nuclear Station  
NRC Senior Resident Inspector - Peach Bottom Atomic Power Station  
NRC Senior Resident Inspector - R.E. Ginna Nuclear Power Plant  
NRC Project Manager - Braidwood Station  
NRC Project Manager - Calvert Cliffs Nuclear Power Plant  
NRC Project Manager - Clinton Power Station  
NRC Project Manager - Limerick Generating Station  
NRC Project Manager - Nine Mile Point Nuclear Station  
NRC Project Manager - Peach Bottom Atomic Power Station  
NRC Project Manager - R.E. Ginna Nuclear Power Plant  
Maryland DNR - S. Seaman  
Pennsylvania DEP - W. DeHaas  
NYSERDA - A. L. Peterson  
Illinois Emergency Management Agency – Division of Nuclear Safety

**ATTACHMENT**

**Relief Request to Utilize Code Case OMN-28, “Alternative Valve Position Verification Approach to Satisfy ISTC-3700 for Valves Not Susceptible to Stem-Disk Separation”**

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**Request to Utilize OMN-28  
In Accordance with 10 CFR 50.55a(z)(1)**

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

The valves covered by this Code Case are those stem-disk separation non-susceptible valves with remote position indication within the scope of Subsection ISTC including its mandatory appendices and their verification methods and frequencies, in accordance with regulatory requirements.

A listing of the valves requiring position indication and testing in accordance with ISTC-3700 was submitted as part of the Inservice Testing Program update performed as part of the interval update and latest revisions for each of the plants identified below.

**2. Applicable ASME OM Code Edition:**

American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code), 2012 Edition with no Addenda. The Intervals dates are:

<b>Station</b>	<b>Code in Effect</b>	<b>Start of Interval</b>	<b>End of Interval</b>
Braidwood Station, Units 1 and 2	OM-2012 Edition, no Addenda	7/29/2018	7/28/2028
Calvert Cliffs Nuclear Power Plant, Units 1 and 2	OM-2012 Edition, no Addenda	7/1/2018	6/30/2028
Clinton Power Station, Unit 1	OM-2012 Edition, no Addenda	7/1/2020	6/30/2030
R. E. Ginna Nuclear Power Plant	OM-2012 Edition, no Addenda	1/1/2020	12/31/2029
Limerick Generating Station, Units 1 and 2	OM-2012 Edition, no Addenda	1/8/2020	1/7/2030
Nine Mile Point Nuclear Station, Units 1 and 2	OM-2012 Edition, no Addenda	1/1/2019	12/31/2028
Peach Bottom Atomic Power Station, Units 2 and 3	OM-2012 Edition, no Addenda	11/16/2018	8/14/2028

**3. Applicable Code Requirements:**

ISTC-3700, *Position Verification Testing*, states: "Valves with remote position indicators shall be observed locally at least once every 2 yr to verify that valve operation is accurately indicated. Where practicable, this local observation should be supplemented by other indications such as use of flow meters or other suitable instrumentation to verify obturator position. These observations need not be concurrent. Where local observation is not

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possible, other indications shall be used for verification of valve operation. Position verification for active MOVs shall be tested in accordance with Mandatory Appendix III of this Division.”

10 CFR 50.55a(b)(3)(xi) *OM condition: Valve Position Indication* states: “When implementing paragraph ISTC–3700, “Position Verification Testing,” in the ASME OM Code, 2012 Edition through the latest edition and addenda of the ASME OM Code incorporated by reference in paragraph (a)(1)(iv) of this section, licensees shall verify that valve operation is accurately indicated by supplementing valve position indicating lights with other indications, such as flow meters or other suitable instrumentation to provide assurance of proper obturator position for valves with remote position indication within the scope of Subsection ISTC including its mandatory appendices and their verification methods and frequencies.”

**4. Reason for Request:**

Pursuant to 10 CFR 50.55a, *Codes and standards*, paragraph (z)(1), an alternative is proposed to the requirement of ASME OM Code ISTC-3700. The position verification with Supplemental Position Indication (SPI) requires the valves to be exercised in the open and closed direction and the valve’s position verified by other indications such as use of flow meters or other suitable instrumentation to verify obturator position.

Code Case OMN-28, “Alternative Valve Position Verification Approach to Satisfy ISTC-3700 for Valves Not Susceptible to Stem-Disk Separation,” has been determined to satisfy the valve position verification requirements in ASME OM Code, Subsection ISTC, paragraph ISTC-3700, for valves that are not susceptible to stem-disk separation.

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

In lieu of compliance with the ISTC-3700, Exelon Generation Company, LLC (Exelon) proposes to implement Code Case OMN-28 on the basis that it provides an acceptable level of quality and safety in accordance with 10 CFR 50.55a, “Codes and standards,” paragraph (z)(1).

The valves covered by this Code Case are those stem-disk separation non-susceptible valves with remote position indication within the scope of Subsection ISTC including its mandatory appendices and their verification methods and frequencies, in accordance with regulatory requirements. Valves with remote position indication within the scope of ASME OM Code, Subsection ISTA, paragraph ISTA-1100, not satisfying the scope and provisions of this Code Case shall meet the valve position verification requirements in ASME OM Code, Subsection ISTC-3700, in accordance with regulatory requirements.

To categorize a valve as not susceptible to stem-disk separation, the valve shall have a documented justification that the stem-disk connection is not susceptible to separation based on the internal design, service conditions, applications and evaluation of the stem-disk connection using plant-specific and industry operating experience, and vendor recommendations. The plants subject to this relief request will prepare this justification.

Valves with remote position indicators that are not susceptible to stem-disk separation shall be verified to accurately represent valve operation as discussed in Section 1.4, “Position

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Verification Testing Requirements for Valves Not Susceptible to Stem-Disk Separation” of the Code Case.

Code Case OMN-28 was approved for use by ASME on March 4, 2021.

No deviations from the Code Case are being proposed.

**6. Duration of Proposed Alternative:**

The proposed alternative is for the remainder of the current intervals as provided in Section 2.

**7. Precedent:**

None

**8. References:**

None