

February 20, 2001

Docket Nos. 50-277

50-278

50-352

50-353

50-289

50-219

License Nos. DPR-44

DPR-56

NPF-39

NPF-85

DPR-50

DPR-16

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

Subject: Peach Bottom Atomic Power Station, Units 2 and 3
Limerick Generating Station, Units 1 and 2
Three Mile Island, Unit 1
Oyster Creek Generating Station
Submittal of Revised Proposed Alternative Concerning the Implementation of the
Performance Demonstration Methods

Reference: Letter from J. J. Hagan (PECO Energy Company, AmerGen Energy
Company, LLC) to NRC, dated December 21, 2000

Dear Sir/Madam:

In the Referenced letter, pursuant to 10 CFR 50.55a(a)(3)(i), and 10 CFR 50.55a(g)(6)(i), PECO Energy Company (now Exelon Generation Company, LLC, Licensee under Facility Operating License Nos. DPR-44 and DPR-56 for Peach Bottom Atomic Power Station, Units 2 and 3, and, Facility Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station, Units 1 and 2) and AmerGen Energy Company, LLC (Licensee under Facility Operating License No. DPR-50 for Three Mile Island, Unit 1, and, Facility Operating License No. DPR-16 for Oyster Creek Generating Station) requested approval of proposed alternatives and a proposed relief

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Performance Demonstration Methods

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request. These proposed alternatives and relief request concern performance demonstration methods for ultrasonic examination systems. As a result of conversations with the NRC, attached is a revised Alternative VIII-1, concerning depth sizing criteria.

If you have any questions, please contact us.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. Hagan". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Joseph J. Hagan
Senior Vice President - Nuclear Operations
Exelon Generation Company, LLC
AmerGen Energy Company, LLC

Enclosures

cc: H. J. Miller, Administrator, Region I, USNRC
A. C. McMurtray, NRC Senior Resident Inspector, PBAPS
A. L. Burritt, NRC Senior Resident Inspector, LGS
J. D. Orr, TMI, Senior Resident Inspector
L. Dudes, Oyster Creek, Senior Resident Inspector

ENCLOSURE

PROPOSED ALTERNATIVE VIII-1, DEPTH SIZING CRITERION

ALTERNATIVE NUMBER VIII-1
DEPTH SIZING CRITERIA

REVISION 0

Peach Bottom Atomic Power Station, Units 2 and 3

Limerick Generating Station, Units 1 and 2

Three Mile Island, Unit 1

Oyster Creek Generating Station

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COMPONENT IDENTIFICATION

Code Class: Class 1

Reference: ASME, Section XI, Table IWB-2500-1
(1989 Edition for Peach Bottom Atomic Power Station, Units 2 and 3, and Limerick Generating Station, Units 1 and 2; 1986 Edition for Oyster Creek Generating Station and Three Mile Island, Unit 1)

Examination Categories: B-A

Item Numbers: B1.11, B1.12, B1.21, B1.22, B1.51

Description: Alternative requirements to Appendix VIII, Supplement 4, "Qualification Requirements for the Clad/Base Metal Interface of Reactor Vessel"

Component Numbers: All Components

CODE REQUIREMENT

Section XI (1995 Edition with the 1996 Addenda), Appendix VIII, Supplement 4, Subparagraph 3.2(b) requires "flaw lengths estimated by ultrasonics shall be the true length -1/4 inch + 1 inch."

10 CFR 50.55a(b)(2)(xv)(C)(1) as amended by Federal Register Notice (Volume 64, No. 183 dated September 22, 1999), requires that when applying Appendix VIII, Supplement 4, a depth sizing acceptance criterion of 0.15 inch Root Mean Square (RMS) shall be used in lieu of the requirements of Subparagraph 3.2(a) and 3.2(b) of the 1995 Edition, 1996 Addenda of the ASME BPV Code, Section XI, Appendix VIII. Subparagraph 3.2(c) contains additional requirements for statistical parameters.

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REVISION 0

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BASIS FOR ALTERNATIVE

10 CFR 50.55a as amended by Federal Register Notice (Volume 64, No. 183 dated September 22, 1999) requires the implementation of the ASME Code, Section XI, Appendix VIII, Supplement 4, 1995 Edition with the 1996 Addenda. The required implementation date for Supplement 4 was November 22, 2000.

10 CFR 50.55a(b)(2)(xv)(C)(1) as amended by Federal Register Notice (Volume 64, No. 183 dated September 22, 1999), requires that when applying Appendix VIII, Supplement 4, a depth sizing acceptance criterion of 0.15 inch Root Mean Square (RMS) shall be used in lieu of the requirements of Subparagraph 3.2(a) and 3.2(b) of the 1995 Edition, 1996 Addenda of the ASME BPV Code, Section XI, Appendix VIII. This depth sizing criterion of 0.15 inch RMS is appropriate to Subparagraph 3.2(a), but is not appropriate to Subparagraph 3.2(b) because Subparagraph 3.2(b) addresses length sizing, not depth sizing.

Performance demonstrations administered by the Performance Demonstration Initiative (PDI) have used a length sizing acceptance criteria of 0.75 inch RMS since its inception. This length sizing tolerance is included in ASME Code Case N-622. The NRC has approved the use of Code Case N-622 for Florida Power and Light Company's St. Lucie Plant Unit 2 (TAC No. MA5041).

Conversations between NRC Staff and representatives from PDI were held on January 12, 2000. In this conversation it was acknowledged that the 0.75 inch RMS length sizing criteria should have been addressed in the modifications provided for Supplement 4 to Appendix VIII in 10 CFR 50.55a(b)(2)(xv)(C). It was also stated that this omission in the rule will be corrected in an upcoming rule.

Additionally, in a public meeting on October 11, 2000, the PDI identified the discrepancy between Subparagraph 3.2(c) and the PDI program. The NRC agreed that 10 CFR 50.55a(b)(2)(xv)(C)(1) should have excluded Subparagraph 3.2(c) as a requirement. The staff will correct the errors in an upcoming rule.

PROPOSED ALTERNATIVE EXAMINATION

Pursuant to 10 CFR 55.55a(a)(3)(i), Peach Bottom Atomic Power Station, Units 2 and 3, Limerick Generating Station, Units 1 and 2, Three Mile Island, Unit 1, and Oyster Creek Generating Station request approval to use the alternative requirements for length sizing (length sizing of .75 RMS) in lieu of Subparagraph 3.2(b). Specifically, in lieu of the

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length sizing requirements of Supplement 4 Subparagraph 3.2(b) of the 1995 Edition, 1996 Addenda of ASME Section XI, Appendix VIII, a length sizing qualification of .75 inch RMS will be used. We also request the use of the Root Mean Square (RMS) calculations of 3.2(a), which utilizes an RMS value of 10 CFR 50.55a(b)(2)(xv)(C)(1) (.15 inch), and 3.2(b) (.75 inch RMS), in lieu of the statistical parameters of 3.2(c).

As discussed above and demonstrated by the PDI, the use of a 0.75 inch RMS length sizing criterion will provide an acceptable level of quality and safety.

APPLICABLE TIME PERIOD

This alternative is requested for the remaining duration of the inspection interval at Peach Bottom Atomic Power Station, Units 2 and 3, Limerick Generating Station, Units 1 and 2, Three Mile Island, Unit 1, and Oyster Creek Generating Station.