

AmerGen Energy Company, LLC  
200 Exelon Way  
Suite 345  
Kennett Square, PA 19348

www.exeloncorp.com

An Exelon/British Energy Company

10 CFR 50.55a

May 30, 2003  
5928-03-20120

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

Three Mile Island, Unit 1  
Facility Operating License No. DPR-50  
NRC Docket No. 50-289

**Subject:** Implementation of the Performance Demonstration Methods Supplement Ten (10) – "Qualification Requirements for Dissimilar Metal Piping Welds"

**Reference:** Letter from M. P. Gallagher (Exelon Generation Company, LLC) to U. S. Nuclear Regulatory Commission, dated March 26, 2003

Dear Sir/Madam:

In the referenced letter, AmerGen Energy Company (AmerGen), LLC, requested approval of a proposed alternative in accordance with 10 CFR 50.55a(a)(3)(i) concerning performance demonstration methods for ultrasonic examination systems. Specifically, this proposed alternative concerns dissimilar metal piping welds as implemented by Supplement 10.

As discussed in the referenced letter, additional relief regarding the RMS value for crack depth sizing would be addressed in separate correspondence. Accordingly, personnel qualifying to the Supplement 10 procedures were not capable of being qualified to an overall error less than or equal to a 0.125" RMS for crack depth sizing capability for TMI. Further review by the PDI Technical Working Group has determined that an error of up to 0.154" RMS should be considered during fracture mechanics calculations utilizing depth-sizing measurements obtained with the Supplement 10 procedure. Therefore, AmerGen requests use of this 0.154" RMS value for TMI.

For the purposes of flaw evaluation, AmerGen would use the difference between the RMS error of 0.154" (i.e., the value currently achieved by the vendor (Framatome ANP, Inc.)) and the value required by the Code (0.125" RMS) to increase the flaw depth.

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Implementation of the Performance Demonstration Methods Supplement Ten (10) –  
“Qualification Requirements for Dissimilar Metal Piping Welds”  
May 30, 2003  
Page 2

AmerGen requests that this relief be in effect for 18 months. If after time, the 0.125" RMS value is not achievable, AmerGen will re-apply for relief. The 18-month duration will allow industry vendors to explore and enhance technology towards reaching the Code goal of 0.125" RMS.

We request your approval by September 16, 2003.

If you have any questions, please contact us.

Very truly yours,



Michael P. Gallagher  
Director, Licensing and Regulatory Affairs  
AmerGen Energy Company, LLC

cc: H. J. Miller, Administrator – Region I, USNRC  
USNRC Senior Resident Inspector  
T. Colburn, USNRC Senior Project Manager  
File No. 03033