UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 26, 2014

LICENSEE: Exelon Generating Company, LLC

FACILITY: Peach Bottom Atomic Power Station, Units 2 and 3

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE ON AUGUST 24, 2014, VERBAL AUTHORIZATION OF RELIEF REQUEST FOR PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3 (TAC NOS. MF4683 AND MF4684)

## INTRODUCTION

By two letters dated August 24, 2014, Exelon Generation Company, LLC (Exelon, the licensee) requested emergency relief from the requirements of the American Society of Mechanical Engineers *Boiler and Pressure Vessel Code* (ASME Code), Section XI, IWD-3120(b) and IWA-4000, for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3.

This memorandum summarizes the telephone discussion on August 24, 2014, between the U.S. Nuclear Regulatory Commission (NRC) staff and Exelon regarding the relief request. During this telephone call, the NRC staff provided verbal authorization of the relief request as described below. Participants in the discussion from Exelon included: Tom Loomis, Phil Breidenbaugh, Erik Frederickson, Calvin Taylor, Matt Herr, Pat Navin, Mike Massaro, Doug Hild, Jim Armstrong, Ron DiSabatino, Dave Henry, Madison Long, Jim Barstow, Tim Moore, and Dave Gudger. Participants for the NRC included: Robert Schaaf, David Alley, John Tsao, Rick Ennis, Fred Bower, and Sam Hansell.

## BACKGROUND

On August 23, 2014, the licensee discovered a pinhole leak in the emergency service water (ESW) system on a pipe elbow located between check valve CHK-2-33-513 and hand valve HV-2-33-502.

The PBAPS, Units 2 and 3, Limiting Condition for Operation (LCO) for Technical Specification (TS) 3.7.2, "Emergency Service Water (ESW) System and Normal Heat Sink," requires that two ESW subsystems and the normal heat sink be OPERABLE. Due to the leak, at 1300 on August 23, 2014, the licensee declared both ESW subsystems inoperable. With both subsystems inoperable, the LCO Actions required that both units be in Mode 3 within 12 hours, and in Mode 4 within 36 hours. At approximately 1800 on August 23, 2014, Exelon requested a Notice of Enforcement Discretion (NOED) to extend the 12-hour completion time by an additional 48 hours, to avoid a plant shutdown, and to allow additional time for the completion of calculations in order to demonstrate that a through-wall leak in the ESW piping would meet the eligibility requirements for a relief request that would result in the ESW system being able to be declared OPERABLE with the leak.

At 1922 on August 23, 2014, the NRC staff granted the licensee's NOED request to extend the time for both units to be in Mode 3 from 12 hours to 60 hours. With the NOED approval, the TS completion time was scheduled to expire at 0100 on August 26, 2014.

**RELIEF REQUEST TELEPHONE CALL**

The NRC staff discussed the following during the telephone call with Exelon on August 24, 2014, with respect to the relief request submitted on August 24, 2014:

Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(a)(3)(ii), the licensee submitted this relief request to propose the use of the procedures contained in ASME Code Case N-513-3, as augmented by the analytical approach contained in ASME Code Case N-513-4. ASME Code Case N-513-3 has been conditionally approved for use by the NRC staff. ASME Code Case N-513-4 has not been approved for use by the NRC staff. The relief request is intended to provide an acceptable analytical method to determine the structural integrity of the ESW system elbow located between check valve CHK-2-33-513 and hand valve HV-2-33-502 as an alternative to the requirements of the ASME Code.

In its request, the licensee stated that it will follow all provisions of Code Case N-513-3 except paragraph 1(c), which limits the use of the code case to straight pipe. The NRC staff reviewed the pressure and temperature of the system for which relief is sought and found them to be within the limits for which the use of Code Case N-513-3 is applicable. The NRC staff also reviewed the leak rate information contained in the licensee's submittal and finds that it provides reasonable assurance that the leakage from the elbow will not adversely affect the safety function of the system or the surrounding equipment. Additionally, the NRC staff reviewed aspects of the licensee's proposal other than the structural analysis of the elbow. Based on its prior approval of Code Case N-513-3, the NRC staff finds that the licensee's adherence to Code Case N-513-3 is acceptable. Finally the NRC staff evaluated the structural analysis of the elbow. The NRC staff finds that the licensee's approach is consistent with that contained in Code Case N-513-4 and that, for this issue, both the methodology and the analytical results are acceptable.

The NRC staff determined that the proposed alternative provides reasonable assurance of the structural integrity of the subject ESW system piping. The NRC staff finds that complying with IWA-4000 of the ASME Code, Section XI, will result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. Accordingly, the NRC staff concluded that the licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(a)(3)(ii). Therefore, the NRC authorized the use of the proposed alternative at PBAPS, Units 2 and 3, until the acceptance criteria contained in Code Case N-513 or the licensee's submittal are exceeded or until the end of the next refueling outage for PBAPS, Unit 2, which is currently scheduled for fall 2014, whichever occurs first.

All other requirements in ASME Code, Section XI, for which relief was not specifically requested and approved in this relief request remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

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

Therefore, in accordance with 10 CFR 50.55a(a)(3)(ii), based on the hardship without a compensating increase in the level of quality and safety, the NRC staff, with the concurrence of Robert Schaaf, Chief of the Plant Licensing Branch I-2, Office of Nuclear Reactor Regulation (NRR), and David Alley, Chief of the Component Performance, Non-Destructive Examination, and Testing Branch, NRR, granted the relief request for PBAPS, Units 2 and 3. The NRC staff's final safety evaluation will be provided as a matter of routine by separate correspondence.

If you have any questions, please contact me at (301) 415-1420 or by e-mail at Rick.Ennis@nrc.gov.

Richard B. Ennis, Senior Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-277 and 50-278

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