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NL-17-0082

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555-0001

Joseph M. Farley Nuclear Plant – Units 1 and 2
Submittal of the Inservice Testing Program
Alternatives for the Fifth Ten-Year Interval

Ladies and Gentlemen:

Pursuant to 10 CFR 50.55a(z) and 10 CFR 50.55a(f), Southern Nuclear Operating Company (SNC) hereby requests Nuclear Regulatory Commission (NRC) approval of the following alternatives for Farley Nuclear Plant (FNP) Units 1 and 2. These alternatives are applicable to the Fifth Ten-Year Interval Inservice Testing Program which will start on December 1, 2017:

| | |
|---|---|
| RR-PR-02 | Establish test flow reference ranges per Code Case OMN-21 |
| RR-PR-03 | Service Water Pumps and Transfer Pumps Pressure Accuracy |
| RR-VR-01 | Establish 1st interval grace periods per Code Case OMN-20 |

SNC requests that the NRC approve the proposed alternatives for FNP Units 1 and 2 by November 15, 2017.

This letter contains no NRC commitments. If you have any questions, please contact Ken McElroy at 205.992.7369.

Respectfully submitted,

C R Pierce

C.R. Pierce
Regulatory Affairs Director

CRP/JMC/lac

Enclosures:
1. Proposed Alternative RR-PR-02, Version 1.0
2. Proposed Alternative RR-PR-03, Version 1.0
3. Proposed Alternative RR-VR-01, Version 1.0

cc: Southern Nuclear Operating Company
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**Joseph M. Farley Nuclear Plant Unit 1 and 2**
**Submittal of the Inservice Testing Program**
**Alternatives for the Fifth Ten-Year Interval**

**Enclosure 1**

**Proposed Alternative RR-PR-02, Version 1.0**

| | |
|---|---|
| PLANT/UNIT: | Farley Nuclear Plant (FNP), Units 1 and 2 |
| INTERVAL: | 5th Interval beginning December 1, 2017, and ending November 30, 2027 |
| COMPONENTS AFFECTED: | Refer to Table RR-PR-02 |
| CODE EDITION AND ADDENDA: | ASME OM Code-2004 Edition with Addenda through OMb-2006 |
| REQUIREMENTS: | ISTB-5121, "Group A Test Procedure," paragraph ISTB-5121(b) states, in part, that "The resistance of the system shall be varied until the flow rate equals the reference point. ...Alternatively, the flow rate shall be varied until the differential pressure equals the reference point..."<br><br>ISTB-5122, "Group B Test Procedure," paragraph ISTB-5122(c) states, "System resistance may be varied as necessary to achieve the reference point."<br><br>ISTB-5123, "Comprehensive Test Procedure," paragraph ISTB-5123(b) states, in part, that "the resistance of the system shall be varied until the flow rate equals the reference point. ...Alternatively, the flow rate shall be varied until the differential pressure equals the reference point..."<br><br>ISTB-5221, "Group A Test Procedure," paragraph ISTB-5221(b) states, in part, that "The resistance of the system shall be varied until the flow rate equals the reference point. ...Alternatively, the flow rate shall be varied until the differential pressure equals the reference point..."<br><br>ISTB-5222, "Group B Test Procedure," paragraph ISTB-5222(c) states, "System resistance may be varied as necessary to achieve the reference point."<br><br>ISTB-5223, "Comprehensive Test Procedure," paragraph ISTB-5123(b) states, in part, that "The resistance of the system shall be varied until the flow rate equals the reference point. ...Alternatively, the flow rate shall be varied until the differential pressure equals the reference point..." |
| REASON FOR REQUEST: | Pursuant to 10 CFR 50.55a, "Codes and standards," paragraph (z)(1), an alternative is proposed to the pump testing reference value requirements of the ASME OM Code. The basis of the request is that the proposed alternative would provide an acceptable level of quality and safety. Specifically, this alternative is requested for all inservice testing of IST Program pumps for FNP, Units 1 and 2, as listed in attached Table RR-PR-02, Pumps Affected by Alternative Request RR-PR-02. |

REASON FOR REQUEST: (continued)

For pump testing, there is difficulty adjusting system throttle valves with sufficient precision to achieve exact flow reference values during subsequent IST tests. Subsection ISTB of the ASME OM Code does not allow for variance from a fixed reference value for pump testing. However, NUREG-1482, Revision 2, Section 5.3, acknowledges that certain pump system designs do not allow for the licensee to set the flow at an exact value because of limitations in the instruments and controls for maintaining steady flow.

ASME OM Code Case OMN-21, "Alternative Requirements for Adjusting Hydraulic Parameters to Specified Reference Points," provides guidance for adjusting reference flow or differential pressure ($\Delta P$) to within a specified tolerance during pump inservice testing. The Code Case states that:

> "It is the opinion of the Committee that when it is impractical to operate a pump at a specified reference point and adjust the resistance of the system to a specified reference point for either flow rate, differential pressure or discharge pressure, the pump may be operated as close as practical to the specified reference point with the following requirements. The Owner shall adjust the system resistance to as close as practical to the specified reference point where the variance from the reference point does not exceed + 2% or - 1% of the reference point when the reference point is flow rate, or + 1% or - 2% of the reference point when the reference point is differential pressure or discharge pressure."

The NRC also discusses this ASME Code change in NUREG-1482, Revision 2, Section 5.3.

PROPOSED ALTERNATIVE AND BASIS:

FNP seeks to perform future inservice pump testing in a manner consistent with the requirements as stated in ASME OM Code Case OMN-21. Specifically, testing of all pumps identified in Table RR-PR-02 will be performed such that the flow rate is adjusted as close as practical to the reference value and within proceduralized limits of +2% / -1% of the reference flow rate when the reference point is flow rate and the differential pressure will be adjusted as close as practical to the reference value and within the proceduralized limits of +1% / -2% of the reference differential pressure when the reference point is differential pressure.

FNP plant operators will continue to strive to achieve the exact test reference values (flow or differential pressure) during testing. Typical test guidance will be to adjust flow or differential pressure to the specific reference value with additional guidance that if the reference value cannot be achieved with reasonable effort, the test will be considered valid if the steady state flow rate is within the proceduralized limits of +2% / -1% of the reference value or the steady state differential pressure is within the proceduralized limits of +1% / -2% of the reference value.

PROPOSED ALTERNATIVE AND BASIS: (Continued)

Using the provisions of this request as an alternative to the specific requirements of ISTB-5121, ISTB-5122, ISTB-5123, ISTB-5221, ISTB-5222, and ISTB-5223, as described above, will provide adequate indication of pump performance and continue to provide an acceptable level of quality and safety.

Based on the determination that the use of controlled reference value ranges provides an acceptable level of quality and safety, this proposed alternative should be granted pursuant to 10 CFR 50.55a(z)(1).

DURATION:

5th IST Interval, beginning December 1, 2017, and ending November 30, 2027

PRECEDENTS:

1. Callaway Plant, Unit 1 – Relief Request PR-06, Alternative to ASME OM Code Requirements for IST for the Fourth Program Interval – Safety Evaluation dated July 15, 2014 (ML14178A769)

2. Wolf Creek Generating Station –Request for Relief 4PR-01 for the Fourth 10-Year Inservice Testing Program Interval – Safety Evaluation dated May 15, 2015 (ML15134A002)

REFERENCES:

1. ASME Code Case OMN-21, Alternative Requirements for Adjusting Hydraulic Parameters to Specified Reference Points

2. NUREG-1482, Revision 2, Guidelines for Inservice Testing at Nuclear Power Plants: Inservice Testing of Pumps and Valves and Inservice Examination and Testing of Dynamic Restraints (Snubbers) at Nuclear Power Plants, Section 5.3, Allowable Variance from Reference Points and Fixed-Resistance Systems, dated October 2013 (ML13295A020)

**Table RR-PR-02, Pumps Affected by Alternative Request RR-PR-02**

| Pump Groups (Unit 1) | Description | Pump Type | ASME Code Class | ASME OM Code Category |
|---|---|---|---|---|
| Q1E11P001A<br>Q1E11P001B | Residual Heat Removal (RHR) | Centrifugal | 2 | Group A |
| Q1E13P001A<br>Q1E13P001B | Containment Spray (CS) | Centrifugal | 2 | Group B |
| Q1E21P002A<br>Q1E21P002B<br>Q1E21P002C | Charging/High Head Safety Injection (HHSI) | Centrifugal | 2 | Group A |
| Q1E21P005A<br>Q1E21P005B | Boric Acid Transfer (BAT) | Centrifugal | 3 | Group A |
| Q1N23P001A<br>Q1N23P001B | Motor Driven Auxiliary Feedwater (AFW) | Centrifugal | 3 | Group A |
| Q1N23P002 | Turbine Driven AFW | Centrifugal | 3 | Group B |
| Q1P16P001A<br>Q1P16P001B<br>Q1P16P001C<br>Q1P16P001D<br>Q1P16P001E | Service Water | Vertical Line Shaft Centrifugal | 3 | Group A |
| Q1P17P001A<br>Q1P17P001B<br>Q1P17P001C | Component Cooling Water | Centrifugal | 3 | Group A |

**Table RR-PR-02, Pumps Affected by Alternative Request RR-PR-02**

| Pump Groups (Unit 2) | Description | Pump Type | ASME Code Class | ASME OM Code Category |
|---|---|---|---|---|
| Q2E11P001A<br>Q2E11P001B | Residual Heat Removal (RHR) | Centrifugal | 2 | Group A |
| Q2E13P001A<br>Q2E13P001B | Containment Spray (CS) | Centrifugal | 2 | Group B |
| Q2E21P002A<br>Q2E21P002B<br>Q2E21P002C | Charging/High Head Safety Injection (HHSI) | Centrifugal | 2 | Group A |
| Q2E21P005A<br>Q2E21P005B | Boric Acid Transfer (BAT) | Centrifugal | 3 | Group A |
| Q2N23P001A<br>Q2N23P001B | Motor Driven AFW | Centrifugal | 3 | Group A |
| Q2N23P002 | Turbine Driven AFW | Centrifugal | 3 | Group B |
| Q2P16P001A<br>Q2P16P001B<br>Q2P16P001C<br>Q2P16P001D<br>Q2P16P001E | Service Water | Vertical Line Shaft Centrifugal | 3 | Group A |
| Q2P17P001A<br>Q2P17P001B<br>Q2P17P001C | Component Cooling Water | Centrifugal | 3 | Group A |

**Joseph M. Farley Nuclear Plant Unit 1 and 2**
**Submittal of the Inservice Testing Program**
**Alternatives for the Fifth Ten-Year Interval**

**Enclosure 2**

**Proposed Alternative RR-PR-03, Version 1.0**

| | |
|---|---|
| PLANT/UNIT: | Farley Nuclear Plant, Units 1 and 2 |
| INTERVAL: | 5th Interval beginning December 1, 2017, and ending November 30, 2027 |
| COMPONENTS AFFECTED: | Refer to Table RR-PR-03, Applicable Pumps |
| CODE EDITION AND ADDENDA: | ASME OM Code-2004 Edition with Addenda through OMb-2006 |
| REQUIREMENTS: | ISTB-3510(a), *Accuracy*, states, "Instrument accuracy shall be within the limits of Table ISTB-3510-1."<br><br>Table ISTB-3510-1, Required Instrument Accuracy, requires pressure instrument accuracy for Comprehensive and Preservice Test pressure instrument accuracy to be ±0.5%. |
| REASON FOR REQUEST: | In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (z)(1), an alternative is proposed to the accuracy requirement of ASME OM Code ISTB, Table ISTB-3510-1. The basis of the request is that the proposed alternative would provide an acceptable level of quality and safety.<br><br>Table ISTB-3510-1 specifies the pressure instrument accuracy to ±0.5% during the comprehensive pump test. Due to the design of the Service Water (SW) pumps (vertical line shaft), the suction pressure is determined using the SW wet pit level (WPL) and pump elevation. The WPL is recorded by reading the gauge on a concrete column in the wet pit. This gauge does not meet the accuracy requirements of Table ISTB-3510-1 for determining pressure. |
| PROPOSED ALTERNATIVE AND BASIS: | The SW pumps draw suction from the Service Water Intake Structure (SWIS) wet pit. The WPL determines the suction pressure when determining the pump differential pressure for inservice testing of the SW pumps. Pump inservice testing is performed by setting the pump differential pressure to within a fixed "band" based on WPL and discharge pressure. This results in a differential pressure within a 2% band around a reference differential pressure ($\Delta Pr$) value of 82.37 psig as shown in Table 1 below. The flow rate is then measured and compared to OM Code acceptance ranges. |

PROPOSED ALTERNATIVE AND BASIS: (continued)

| Table 1, Pump Differential Pressure | | | | |
|---|---|---|---|---|
| Wet Pit Level (WPL) | Discharge Pressure (PD) | | | |
| | 78.00 | | 81.00 | |
| | ΔP | ΔP/ΔPr | ΔP | ΔP/ΔPr |
| **185.0** | 81.08 | 0.98 | 84.08 | 1.02 |
| **185.5** | 80.86 | 0.98 | 83.86 | 1.02 |

Instrument Accuracy/Precision:

A WPL gauge located on the wet pit concrete column is used to determine the SW pump suction pressure. The WPL gauge is a 5 foot gauge that is divided into increments of 0.2 foot. The best possible reading of this gauge is to the 0.1 foot markings due to location and system conditions. Therefore, the best accuracy for the suction pressure reading is 2% (0.1 ft/5.0 ft) which does not meet the accuracy requirement of Table ISTB-3510-1 for the comprehensive pump test.

The test procedures include an acceptance criterion that requires the WPL remain in a "band" between 185.0 and 185.5 feet (6 inch range). For an acceptable test, the variance in the WPL can be no more than the difference between the upper and lower acceptance criteria limits. By restricting the WPL range, the suction pressure for each SW pump test is essentially a constant value. A constant WPL reference of 185.25 feet can be assigned by the test procedure resulting in the maximum level difference of 0.25 feet, which equates to a maximum pressure difference of 0.109 pounds per square inch (psi) [(0.25 ft)/(2.31 ft per psi)].

The maximum difference in suction pressure equates to only 0.14% of the minimum reference value for the pump differential pressure [(0.109 psi / 80.86 psi)]. The precision of the suction pressure reading based on the WPL results in an acceptable method for setting the reference value for pump differential pressure.

FNP proposes to perform SW pump Group A and comprehensive pump testing using the installed WPL gauge to confirm the near constant suction pressure for the SW pumps. All other measurements for SW pump testing will comply with OM Code requirements.

Using the provisions of this request, as an alternative to the specific requirements of ISTB Table 3510-1 identified above, will provide an acceptable level of quality and safety for testing the pumps listed in Table RR-PR-03. Therefore, pursuant to 10 CFR 50.55a(z)(1), FNP requests approval of this proposed alternative to these specific ISTB requirements.

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| DURATION: | 5th IST Interval, beginning December 1, 2017, and ending November 30, 2027 |
| PRECEDENT: | Edwin I. Hatch Nuclear Plant, Units 1 and 2, Inservice Testing Program Relief Request [RR-11] and Alternatives for Pumps and Valves – Fifth Ten-Year Interval, dated December 30, 2015 (ML15310A406) |

| Table RR-PR-03, Applicable Pumps | | | | |
|---|---|---|---|---|
| Pumps (Units 1 & 2) | Description | Pump Type | Code Class | OM Code Category |
| Q1P16P001A-A<br>Q1P16P001B-A<br>Q1P16P001C-AB<br>Q1P16P001D-B<br>Q1P16P001F-B<br><br>Q2P16P001A-A<br>Q2P16P001B-A<br>Q2P16P001C-AB<br>Q2P16P001D-B<br>Q2P16P001E-B | Service Water Pumps | Vertical Line Shaft Centrifugal | 3 | Group A |

**Joseph M. Farley Nuclear Plant Unit 1 and 2**
**Submittal of the Inservice Testing Program**
**Alternatives for the Fifth Ten-Year Interval**

**Enclosure 3**

**Proposed Alternative RR-VR-01, Version 1.0**

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|---|---|
| PLANT/UNIT: | Farley Nuclear Plant (FNP), Units 1 and 2 |
| INTERVAL: | 5th Interval beginning December 1, 2017, and ending November 30, 2027 |
| COMPONENTS AFFECTED: | Pumps and Valves contained within the Inservice Testing Program scope |
| CODE EDITION AND ADDENDA: | ASME OM Code-2004 Edition with Addenda through OMb-2006 |
| REQUIREMENTS: | This request applies to the following test frequency requirements of the ASME OM Code. |

ISTA-3120(a), Inservice Test Interval, states, "The frequency for inservice testing shall be in accordance with the requirements of Section IST."

ISTB-3400, Frequency of Inservice Tests, states, "An inservice test shall be run on each pump as specified in Table ISTB-3400-1."

Table ISTB-3400-1, Inservice Test Frequency, notes that Group A and Group B pump tests are to be conducted quarterly and comprehensive pump tests are to be conducted biennially.

ISTC-3510, Exercising Test Frequency, states, "Active Category A, Category B, and Category C check valves shall be exercised nominally every 3 months..."

ISTC-3540, Manual Valves, states, in part, that "Manual valves shall be full-stroke exercised at least once every 2 years, except where adverse conditions may require the valve to be tested more frequently to ensure operational readiness."

ISTC-3630, Leakage Rate for Other Than Containment Isolation Valves, (a) Frequency, states, "Tests shall be conducted at least once every 2 years."

ISTC-3700, Position Verification Testing, states, in part, that "Valves with remote position indicators shall be observed locally at least once every 2 years to verify that valve operation is accurately indicated."

ISTC-5221, Valve Obturator Movement, (c)(3) states, "At least one valve from each group shall be disassembled and examined at each refueling outage; all valves in each group shall be disassembled and examined at least once every 8 years."

Mandatory Appendix I, Inservice Testing of Pressure Relief Devices in Light-Water Reactor Nuclear Power Plants, I-1320, Test Frequencies, Class 1 Pressure Relief Valves, (a) 5-Year Test Interval, states, in part, that "Class 1 pressure relief valves shall be tested at least once every 5 years, starting with initial electric power

REQUIREMENTS: (Continued)

generation."

Appendix I, I-1330, Test Frequency, Class 1 Nonreclosing Pressure Relief Devices, states, in part, that "Class 1 nonreclosing pressure relief devices shall be replaced every 5 years..."

Appendix I, I-1340, Test Frequency, Class 1 Pressure Relief Valves That Are Used for Thermal Relief Application, states, "Tests shall be performed in accordance with I-1320, Test Frequencies, Class 1 Pressure Relief Valves."

Appendix I, I-1350, Test Frequency, Classes 2 and 3 Pressure Relief Valves, (a) 10Year Test Interval, states, in part, that "Classes 2 and 3 pressure relief valves, with the exception of PWR main steam safety valves, shall be tested every 10 years, starting with initial electric power generation."

Appendix I, I-1360, Test Frequency, Classes 2 and 3 Nonreclosing Pressure Relief Devices, states, in part, that "Classes 2 and 3 nonreclosing pressure relief devices shall be replaced every 5 years..."

Appendix I, I-1370, Test Frequency, Classes 2 and 3 Primary Containment Vacuum Relief Valves, (a) states, in part, that "Tests shall be performed on all Classes 2 and 3 containment vacuum relief valves at each refueling outage or every 2 years, whichever is sooner..."

Appendix I, I-1380, Test Frequency, Classes 2 and 3 Vacuum Relief Valves, Except for Primary Containment Vacuum Relief Valves, states, in part, that "All Classes 2 and 3 vacuum relief valves shall be tested every 2 years..."

Appendix I, I-1390, Test Frequency, Classes 2 and 3 Pressure Relief Devices That Are Used for Thermal Relief Application, states, "Tests shall be performed on all Classes 2 and 3 relief devices used in thermal relief application every 10 years, unless performance data indicate more frequent testing is necessary. In lieu of tests the Owner may replace the relief devices at a frequency of every 10 years, unless performance data indicate more frequent replacements are necessary."

Mandatory Appendix II, Check Valve Condition Monitoring Program, II-4000, Condition Monitoring Activities, (a) Performance Improvement Activities, (1) states, in part, that "If sufficient information is not currently available to complete the analysis required in II-3000, or if this analysis is inconclusive, then the following activities shall be performed at sufficient intervals over an interim period of the next 5 years or two refueling outages, whichever is less, to determine the cause of the failure or the maintenance patterns."

REQUIREMENTS: (Continued)

Appendix II, II-4000(b), Optimization of Condition-Monitoring Activities, (1)(e) states, in part, that "Interval extensions shall be limited to one fuel cycle per extension. Intervals shall not exceed the maximum intervals shown in Table II-4000-1."

REASON FOR REQUEST:

Pursuant to 10 CFR 50.55a, "Codes and Standards," paragraph (z)(2), an alternative is requested from the frequency specifications of the ASME OM Code. The basis of the request is that the Code requirement presents an undue hardship without a compensating increase in the level of quality or safety.

The ASME OM Code Section IST establishes the inservice test frequency for all components within the scope of the Code. The frequencies (e.g., quarterly) have always been interpreted as "nominal" frequencies (generally as defined in Table 3.2 of NUREG 1482, Revision 2) and Owners routinely applied the surveillance extension time period (i.e., grace period) contained in the plant Technical Specifications (TS) Surveillance Requirements (SRs). The TS typically allow for a less than or equal to 25% extension of the surveillance test interval to accommodate plant conditions that may not be suitable for conducting the surveillance (SR 3.0.2). However, regulatory issues have been raised concerning the applicability of the TS "Grace Period" to ASME OM Code-required IST frequencies irrespective of allowances provided under TS Administrative Controls (i.e., TS 5.5.8, "Inservice Testing Program," invokes SR 3.0.2 for various OM Code frequencies). FNP submitted TSTF-545 on July 28, 2016 (NL-16-0091) that removed the specified frequencies from TS 5.5.8 and defaulted control of the frequencies to the Inservice Testing Program.

The lack of a tolerance band on the ASME OM Code IST frequency restricts operational flexibility. There may be a conflict where a surveillance test could be required but where it is not possible or not desired that it be performed until sometime after a certain restricted plant condition is cleared. Therefore, to avoid this conflict, the surveillance test should be performed as soon as it is practicable. The NRC recognized this potential issue in the TS by allowing a frequency tolerance as described in TS SR 3.0.2. The lack of a similar tolerance applied to OM Code testing places an unusual hardship on the plant to adequately schedule work tasks without operational flexibility.

Thus, just as with TS required surveillance testing, some tolerance is needed to allow adjusting the ASME OM Code testing intervals to suit the plant conditions and other maintenance and testing activities. Interval extension is to facilitate test scheduling and considers plant operating conditions that may not be suitable for performance of the required testing (e.g., performance of the test would cause an unacceptable increase in the plant risk profile due to transient conditions or other ongoing surveillance, test, or

REASON FOR REQUEST (Continued):

maintenance activities). Such extensions are not intended to be used repeatedly merely as an operational convenience to extend test intervals beyond those specified.

PROPOSED ALTERNATIVE AND BASIS:

ASME OM Code establishes component test frequencies that are based either on elapsed time periods (e.g., quarterly, 2 years, etc.) or on the occurrence of plant conditions or events (e.g., cold shutdown, refueling outage, upon detection of a sample failure, following maintenance, etc.).

a) Components whose test frequencies are based on elapsed time periods shall undergo Inservice Testing at frequencies as specified in the Farley TS (TS 5.5.8) and shown in the following table:

| Frequency | Specified Time Period Between Tests |
|---|---|
| Quarterly | At least once per 92 days |
| Semiannually | At least once per 184 days |
| Yearly or Annually | At least once per 366 days |
| x years | X calendar years where 'x' is a whole number of years ≥ 2 |

b) The specified time period between tests may be reduced or extended as follows:

1) For periods specified as less than 2 years, the period may be extended by up to 25% for any given test.

2) For periods specified as greater than or equal to 2 years, the period may be extended by up to 6 months for any given test.

3) All periods specified may be reduced at the discretion of the owner (i.e., there is no minimum period requirement).

c) Components whose test frequencies are based on the occurrence of plant conditions or events (e.g., cold shutdown, refueling outage, upon detection of a sample failure, following maintenance, etc.) may not have their period between tests extended except as allowed by the ASME OM Code.

d) Period extensions may not be applied to the test frequency requirements specified in Subsection ISTD, Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-water Reactor Nuclear Power Plants, as Subsection ISTD contains its own rules for period extensions.

PROPOSED ALTERNATIVE AND BASIS (Continued):

e) Period extensions of 25% may also be applied to accelerated test frequencies (e.g., pumps in Alert Range) and other less than 2-year test frequencies not specified in the table above.

This alternative is requested citing the above guidance found in ASME-approved Code Case OMN-20 for determining acceptable tolerances for pump and valve test frequencies. The ASME OM Code Standards Committee approved this Code Case in February 2012. Code Case OMN-20 was subsequently published in conjunction with the ASME OM Code, 2012 Edition.

Based on the determination that compliance with the Code requirement results in a hardship without a compensating increase in the level of quality and safety, this proposed alternative is requested pursuant to 10 CFR 50.55a(z)(2).

DURATION: 5th Interval beginning December 1, 2017, and ending November 30, 2027

PRECEDENCE:

1. Quad Cities Nuclear Power Station, Units 1 and 2, Safety Evaluation in Support of Request for Relief Associated with the Fifth 10-Year Interval IST Program [RR RV-01], dated February 14, 2013 (ML13042A348)

2. Callaway Plant, Unit 1, Requests for Relief [RR PR-04], Alternatives to ASME OM Code Requirements for IST for the Fourth Program Interval – Safety Evaluation dated July 15, 2014 (ML14178A769)

3. Calvert Cliffs Nuclear Power, Units 1 and 2, Relief Request IST-RR-01 Re: Frequency of IST Requirements of Pumps and Valves – Safety Evaluation dated September 24, 2014 (ML14247A555)

4. Three Mile Island, Unit 1 Relief Request VR-02 Associated with Fifth 10-Year IST Interval – Safety Evaluation dated August 15, 2013 (ML13227A024)

5. Dresden Nuclear Power Station, Units 2 and 3, Safety Evaluation in Support of Request for Reliefs [RR RV-01] Associated with the Fifth 10-Year Interval IST Program, dated October 31, 2013 (ML13297A515)

REFERENCES:

1. NRC Regulatory Issue Summary 2012-10, NRC Staff Position on Applying Surveillance Requirements 3.0.2 and 3.0.3 to Administrative Controls Program Tests

2. ASME OM Code Case OMN-20, Inservice Test Frequency

3. Federal Register Vol. 80, No. 181, Proposed 10 CFR 50.55a Rulemaking, dated September 18, 2015 (Pages 56839-56840)

4. Farley Nuclear Plant Technical Specifications