

10 CFR 50.55a(z)

March 27, 2018

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461Dresden Nuclear Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249James A. FitzPatrick Nuclear Power Plant
Renewed Facility Operating License No. DPR-59
NRC Docket No. 50-333LaSalle County Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374Nine Mile Point Nuclear Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-63 and NPF-69
NRC Docket Nos. 50-220 and 50-410Oyster Creek Nuclear Generating Station
Renewed Facility Operating License No. DPR-16
USNRC Docket No. 50-219Quad Cities Nuclear Power Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR 29 and DPR 30
NRC Docket Nos. 50-254 and 50-265

Subject: Withdrawal of Submittal of Relief Request for an Alternative to the ASME Code – Revise Main Steam Isolation Valve Partial Stroke Testing Frequency

References: 1. Letter from D. P. Helker (Exelon Generation Company, LLC), to U.S. Nuclear Regulatory Commission, "Submittal of Relief Request for an Alternative to the ASME Code – Revise Main Steam Isolation Valve Partial Stroke Testing Frequency," dated November 1, 2017 (ADAMS Accession No. ML17306A014)

2. Letter from B. Purnell (U.S. Nuclear Regulatory Commission), "Summary of February 26, 2018, Meeting With Exelon Generation Company, LLC, Regarding Proposed Alternative to the Main Steam Isolation Valve Testing Requirements (EPID L-2017-LLR-0134)," dated March 1, 2018 (ADAMS Accession No. ML18058A523)

In Reference 1, Exelon Generation Company, LLC (Exelon) submitted a relief request associated with the Inservice Testing (IST) programs for Clinton Power Station, Unit 1; Dresden Power Station, Units 2 and 3; James A. FitzPatrick Nuclear Power Plant; LaSalle County Station, Units 1 and 2; Nine Mile Point Nuclear Station, Units 1 and 2; Oyster Creek Nuclear Generating Station; and Quad Cities Nuclear Power Station, Units 1 and 2.

The Reference 1 submittal proposed an authorization to continue to partial stroke exercise Main Steam Isolation Valves (MSIVs) on a limited basis with an ASME OM Code Cold Shutdown Justification (CSJ) currently in place for MSIVs at each of the cited Exelon stations. Exelon proposed that the partial stroke exercise of MSIVs would be performed in accordance with the Surveillance Frequency Control Program (SFCP) and would partially stroke exercise MSIVs at various test intervals until the final refueling outage testing interval was achieved. Exelon's relief request was submitted due to the belief that ISTC-3521(b) and ISTC-3521(c) prohibited any type of exercising of MSIVs with a CSJ in place.

On February 26, 2018, the NRC held a public meeting (Reference 2) to discuss the Reference 1 relief request. The NRC staff stated that the alternative is not needed, since the ASME OM Code does not prevent the continued exercising of MSIVs at power if a CSJ documented in the IST Program Plan document for each site demonstrates that exercising at power is not practicable. In particular, the NRC staff noted that paragraph ISTC-3521(c) of the ASME OM Code states that exercising "may"- not "shall" - be limited to full-stroke exercising during cold shutdown. Thus, paragraph ISTC-3521(c) does not prevent the partial-stroke testing of the MSIVs at power. Exelon will utilize paragraph ISTC-3521(c) for full stroke exercising of the MSIVs during cold shutdown under the IST program while continuing to partially stroke exercise the MSIVs during power operation under the SFCP at various intervals commensurate with the SFCP frequencies.

Based on this information, Exelon agrees with the conclusion that the relief request submitted in Reference 1 is not needed and should be withdrawn. Therefore, Exelon hereby withdraws the Reference 1 relief request.

There are no regulatory commitments contained in this letter.

If you have any questions regarding this letter, please contact David Neff at (267) 533-1132.

Respectfully,



David P. Helker
Manager - Licensing & Regulatory Affairs
Exelon Generation Company, LLC

cc: USNRC Regional Administrator - NRC Region I
USNRC Regional Administrator - NRC Region III
USNRC Project Manager, NRR - Clinton Power Station
USNRC Project Manager, NRR - Dresden Power Station
USNRC Project Manager, NRR - James A. FitzPatrick Nuclear Power Plant
USNRC Project Manager, NRR - LaSalle County Station
USNRC Project Manager, NRR - Nine Mile Point Nuclear Station
USNRC Project Manager, NRR – Oyster Creek Nuclear Generating Station
USNRC Project Manager, NRR – Quad Cities Nuclear Power Station
USNRC Senior Resident Inspector - Clinton Power Station
USNRC Senior Resident Inspector - Dresden Power Station
USNRC Senior Resident Inspector - James A. FitzPatrick Nuclear Power Plant
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