

From: [Tobin, Jennifer](#)
To: ["Helker, David P:\(GenCo-Nuc\)"](#)
Cc: ["Gropp Jr, Richard W:\(GenCo-Nuc\)"; "Loomis, Thomas R:\(GenCo-Nuc\)"](#)
Subject: Peach Bottom Units 2 and 3 - Request for Additional Information - Relief Request I5R-05 (EPID L-2018-LLR-0058)
Date: Tuesday, August 14, 2018 11:17:00 AM
Attachments: [Peach Bottom I5R-05 RAI rev 1.docx](#)

Dear Mr. Helker,

By letter dated March 19, 2018, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18109A116), Exelon Generation Company, LLC (the licensee), submitted alternative request I5R-05 to request relief from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) Section XI, Paragraphs IWA-4221 and IWA-4540(a)(2). The licensee is proposing to use phased array ultrasonic testing as an alternative to the required radiographic testing for the fourth ten year inservice inspection interval at Peach Bottom Atomic Power Station, Units 2 and 3. The proposed alternative I5R-05 is very similar to the wording of ASME code Case N-831 "Ultrasonic Examination in Lieu of Radiography for Welds in Ferritic Pipe, Section XI, Division 1."

The Nuclear Regulatory Commission's (NRC) staff is reviewing your submittal and has determined that additional information is needed to complete its review. The specific request for additional information (RAI) question is provided below. A clarification phone call will be held if needed.

If you have any questions, please contact me at (301) 415-2328. A copy of this e-mail will be made publicly available in ADAMS.

Thanks,
Jenny

Jenny Tobin
Project Manager
NRR/DORL/LPL-1
Office O9-C12 Phone 301-415-2328

REQUEST FOR ADDITIONAL INFORMATION

FOR PROPOSED ALTERNATIVE I5R-05

PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3

EXELON GENERATION COMPANY, LLC

DOCKET NUMBERS 50-277 AND 50-278

(EPID L-2018-LLR-0058)

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The NRC has determined that the following additional information is necessary to complete its review and make a regulatory decision.

1. ASME Code Case N-831 and a previous safety evaluation, dated June 5, 2017, require 100 percent volumetric coverage of the weld volume and the weld-to-base metal interface. The proposed alternative I5R-05 has reduced the coverage requirements to "essentially" 100 percent coverage. Describe the technical basis for not needing 100 percent coverage, including an analysis determining if missing 10 percent of the weld can or cannot allow an unacceptable flaw to be missed.