

10CFR50.55a

February 19, 2019

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

Peach Bottom Atomic Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277 and 50-278

Subject: Submittal of the Snubber Inservice Testing Program Plan for the Fifth
10-Year Interval

In accordance with the ASME OM Code-2012 Edition, attached for your information is a copy of the Snubber Inservice Testing (IST) Program Plan for the Fifth 10-Year Interval for the Peach Bottom Atomic Power Station, Units 2 and 3. The new interval began on January 1, 2019, and will conclude on August 14, 2028.

There are no regulatory commitments contained within this submittal.

If you have any questions or require additional information, please contact David Neff
(267) 533-1132.

Sincerely,



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

Attachment: Peach Bottom Atomic Power Station, Units 2 and 3, Snubber Inservice Testing
(IST) Program Plan for the Fifth 10-Year Interval

cc: Regional Administrator, Region I, USNRC
USNRC Senior Resident Inspector, PBAPS
USNRC Project Manager, PBAPS

ATTACHMENT

Peach Bottom Atomic Power Station, Units 2 and 3 Snubber Inservice Testing (IST) Program Plan Fifth 10-Year Interval

PEACH BOTTOM ATOMIC POWER STATION

1848 Lay Road

Delta, PA 17314

SNUBBER INSERVICE TESTING PROGRAM PLAN

UNIT 2

FIFTH 10-YEAR INTERVAL

Commercial Service Date: July 5, 1974
NRC Docket Number: 50-277
Fifth Interval: January 1, 2019 through August 14, 2028

UNIT 3

FIFTH 10-YEAR INTERVAL

Commercial Service Date: December 23, 1974
NRC Docket Number: 50-278
Fifth Interval: January 1, 2019 through August 14, 2028

Document Number: ER-PB-330-1008
Revision Number: 0

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Exelon Generation Company
Peach Bottom Atomic Power Station Units 2 & 3, Fifth Interval

REVISION LOG

This re-written program plan is the initial issue of the Snubber Program Plan after transition from the ASME ISI Code, Section XI to the ASME OM Code, Section IST. The PBAPS Units 2 and 3 Fourth ISI Interval was extended by fifty-seven (57) days as permitted by Paragraph IWA-2430(c)(1) in order to accommodate the plant refueling outage schedule. Since the snubber program was under the Fourth ISI Interval, it too was extended by the same fifty-seven (57) days and will end on December 31, 2018. Beginning January 1, 2019, the snubber program will be under the OM Code, Section IST and will thereafter be aligned with the IST Interval. The Fifth IST Interval is currently scheduled to end on August 14, 2028.

Description	Prepared By	Date	Reviewed By	Date	Approved By	Date
Fifth Interval Snubber Program Plan	_____		_____		_____	

Exelon Generation Company
Peach Bottom Atomic Power Station Units 2 & 3, Fifth Interval

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Exelon Generation Company
Peach Bottom Atomic Power Station Units 2 & 3, Fifth Interval

1.0 General:

- 1.1 The examination, service life monitoring and testing of all safety related snubbers at Peach Bottom Atomic Power Station (PBAPS) will be implemented and performed in accordance with ER-PB-330-1007, "Snubber Inservice Testing Program" to assess the required operational readiness of these snubbers during a seismic or other event, initiating dynamic loads.
- 1.2 The Snubber program, as defined within ER-PB-330-1007, establishes visual examination, operational readiness testing and service life monitoring requirements, pertaining to mechanical and hydraulic snubbers that are required for safe shutdown of the reactor, maintaining the safe shutdown condition, mitigating the consequences of an accident, or to ensure the integrity of the reactor coolant pressure boundary.
 - 1.2.1 The examination boundaries are the snubber assembly from pin to pin inclusive. Integral and nonintegral attachments for snubbers will be evaluated within the site ISI program, in accordance with the requirements of the ASME Code Section XI, 2013 Edition.
 - 1.2.2 The snubbers included in this program are identified within the ER-PB-330-1007 Snubber Program Document.
- 1.3 The Snubber Program described in ER-PB-330-1007 adheres to the requirements of ASME OM Code, Section IST, 2012 Edition, as required by 10CFR50.55a(b)(3)(v)(B).
- 1.4 The snubber program document ER-PB-330-1007 establishes a Visual Examination program, an Operational Readiness Testing program and a Snubber Service Life Monitoring program for hydraulic and mechanical snubbers, which adhere to the requirements of Subsections ISTD-4000, ISTD-5000 and ISTD-6000 respectively.

2.0 Examination, Testing and Monitoring Requirements:

- 2.1 Visual Examinations and Operational Readiness Testing will be performed to the extent specified within ER-PB-330-1007 and in accordance with Exelon fleet administrative procedures ER-AA-330-004 and ER-AA-330-010.
- 2.2 Snubbers are grouped into Defined Test Plan Groups, (DTPG's) by design type, in accordance with ISTD-5252 for testing purposes. The DTPG's at PBAPS Unit 2 and 3 are specified in ER-PB-330-1007.
- 2.3 The Service Life of all snubbers in this program will be monitored and snubbers replaced or reconditioned as specified in ER-PB-330-1007 and required by Exelon fleet administrative procedure ER-AA-330-011 to ensure that the service life is not exceeded at or before the next scheduled system or plant outage, or during a period when the snubber is required to be operable. The replacement or reconditioning of snubbers will be documented, and records retained in accordance with PBAPS Procedures.

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3.0 Examination and Testing Methods:

- 3.1 Visual Examinations will be performed by individuals qualified in accordance with ISTA-1500(e). Visual Examinations and Operational Readiness Testing shall be performed to verify the requirements specified within ER-PB-330-1007 in accordance with the requirements of Subsection ISTD.

4.0 Examination and Testing Frequency:

- 4.1 Visual Examinations and Operational Readiness Testing shall be performed at the frequency specified within ER-PB-330-1007.
- 4.2 Visual Examinations will be performed whenever new snubber locations are installed, or after system replacements or modifications in accordance with Subsection ISTD-4100.

5.0 Examination, Testing and Monitoring Evaluation:

- 5.1 Snubbers that do not appear to conform to the Visual Examination requirements of ER-PB-330-1007 and procedure ER-AA-330-004, will be evaluated and appropriate corrective action taken.
- 5.2 Snubbers that do not appear to conform to the visual examination acceptance requirements and are later confirmed as operable, as a result of operational readiness testing, may be declared operable for the purpose of establishing the next visual examination interval, providing that the unacceptable condition did not affect operational readiness of the snubber.
- 5.3 Snubbers that do not meet the Operational Readiness Testing acceptance criteria in ER-PB-330-1007 and procedure ER-AA-330-010 will be evaluated to determine the cause of the failure and appropriate corrective action will be taken.
- 5.4 The service life of a snubber is evaluated at least once each fuel cycle using manufacturing input and engineering information gained through consideration of the snubber service conditions and inservice Operational Readiness test results in accordance with ER-PB-330-1007.

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6.0 Repair, Replacement and Modification Requirements:

6.1 Repairs, Replacements and Modifications performed on snubbers under this program shall conform, as applicable, to the requirements specified within the Repair and Replacement Program.

7.0 Scheduling:

7.1 The Visual Examinations and Operational Readiness Testing schedules will be established, tracked and maintained within the Corporate Programs Engineering Department.

7.2 The Snubber Testing Program will identify, and track expanded, or additional testing and/or examinations as specified and required by ER-PB-330-1007 and, in accordance with Subsection ISTD.

8.0 Reports and Records:

8.1 Reports and records for the Visual Examinations and Operational Readiness Testing will be maintained on all snubbers in the scope of the program.

8.2 Applicable records and reports, as required for Repair and Replacements, will be maintained for all snubbers.

8.3 Records of the service life of all hydraulic and mechanical snubbers listed in this program, including the date at which the service life commences, and associated installation and maintenance records will be maintained.