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

December 2, 2019

Mr. Bryan C. Hanson
Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: R. E. GINNA NUCLEAR POWER PLANT – SAFETY EVALUATION OF ALTERNATIVE REQUEST SR-1 RELATED TO SNUBBER PROGRAM ALIGNED WITH SIXTH 10-YEAR INSERVICE TESTING INTERVAL PROGRAM (EPID L-2019-LLR-0061)

Dear Mr. Hanson:

By letter dated June 26, 2019 (Agencywide Documents Access and Management System Accession No. ML19177A218), Exelon Generation Company, LLC (the licensee) submitted an alternative to the requirements of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants, associated with snubber examination at R. E. Ginna Nuclear Power Plant (Ginna). Alternative request SR-1 would implement ASME Code Case OMN-13, Revision 2, for extending snubber inservice visual examination interval.

The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's review of the of alternative request SR-1, as documented in the enclosed safety evaluation. The NRC staff determined that the proposed alternative in this request provides an acceptable level of quality and safety for the snubbers. The NRC staff concludes that the licensee has adequately addressed all of the regulatory requirements set forth in Title 10 of the *Code of Federal Regulations* Section 50.55a(z)(1). Therefore, the NRC staff authorizes the use of alternative request SR-1 for the Ginna snubber program, which is aligned with the Ginna sixth 10-year inservice testing interval scheduled to start on January 1, 2020.

All other ASME Code requirements for which relief was not specifically requested and approved remain applicable.

If you have any questions concerning this matter, please contact the Ginna Project Manager, V. Sreenivas, at (301) 415-2597 or by e-mail to V.Sreenivas@nrc.gov.

Sincerely,

/RA/

James G. Danna, Chief
Plant Licensing Branch 1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-244

Enclosure:
Safety Evaluation

cc: Listserv

SUBJECT: R. E. GINNA NUCLEAR POWER PLANT – SAFETY EVALUATION OF ALTERNATIVE REQUEST SR-1 RELATED TO SNUBBER PROGRAM ALIGNED WITH SIXTH 10-YEAR INSERVICE TESTING INTERVAL PROGRAM (EPID L-2019-LLR-0061) DATED DECEMBER 3, 2019

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UNITED STATES
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WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

ALTERNATIVE REQUEST SR-1 RELATED TO SNUBBER PROGRAM ALIGNED WITH SIXTH 10-YEAR INSERVICE TESTING INTERVAL PROGRAM

EXELON GENERATION COMPANY, LLC

R. E. GINNA NUCLEAR POWER PLANT

DOCKET NO. 50-244

1.0 INTRODUCTION

By letter dated June 26, 2019 (Agencywide Documents Access and Management System Accession No. ML19177A218), Exelon Generation Company, LLC (the licensee) submitted an alternative to the requirements of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code), associated with snubber examination at R. E. Ginna Nuclear Power Plant (Ginna). The proposed alternative request SR-1 would implement Code Case OMN-13, Revision 2, for extending snubber inservice visual examination interval.

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(z)(1), the licensee requested to use proposed alternative in request SR-1 on the basis that the alternative provides an acceptable level of quality and safety.

The Ginna snubber inservice examination and testing interval aligned with sixth 10-year inservice testing (IST) interval starts on January 1, 2020, and is scheduled to end on December 31, 2029.

2.0 REGULATORY EVALUATION

The regulation at 10 CFR 50.55a(g)(4) states, in part, that inservice inspection of certain ASME Code Class 1, 2, and 3 components be performed in accordance with the Section XI of ASME Boiler and Pressure Vessel Code (BPV Code) (or ASME OM Code for snubber examination and testing) and applicable addenda incorporated by reference in the regulations.

The regulation at 10 CFR 50.55a(b)(3)(v)(B) states, in part, that the licensee must comply with the provisions for examination and testing snubbers in Subsection ISTD of the ASME OM Code when using 2006 Addenda and later editions and addenda of Section XI of the ASME BPV Code.

The regulation at 10 CFR 50.55a(z) states that alternatives to the requirements of paragraph (g) of 10 CFR 50.55a may be used when authorized by the NRC if the licensee demonstrates (1) the proposed alternatives provide an acceptable level of quality and safety or (2) compliance with the specified requirements would result in hardship or unusual difficulty, without a compensating increase in the level of quality and safety.

3.0 TECHNICAL EVALUATION

3.1 Licensee's Alternative Request SR-1

The licensee requested to use Code Case OMN-13, Revision 2, to extend the examination intervals for all snubbers within the scope of the Ginna snubber programs.

Applicable Code Edition/Addenda

The applicable ASME BPV Code edition and addenda for the Ginna sixth 10-year inservice inspection interval is the 2013 Edition with no Addenda. The applicable code for snubber inservice examination and testing is the 2012 Edition of the ASME OM Code with no addenda.

Applicable Code Requirements

ISTD-4252, "Subsequent Examination Intervals," (c), states, "The duration of examination intervals following the completion of the second refueling outage shall be in accordance with Table ISTD-4252-1."

ISTA-3130, "Application of Code Cases," (b), states, "Code Cases shall be applicable to the edition and addenda specified in the test plan."

ASME OM Code Case OMN-13, Revision 2, "Performance-Based Requirements for Extending Snubber Inservice Visual Examination Interval at LWR Power Plants."

Reason for Request

The licensee states, in part:

> ISTA-3130(b) states, "Code Cases shall be applicable to the edition and addenda specified in the test plan." ASME has approved CC [Code Case] OMN-13, Revision 2 [in ASME OM Code 2012 Edition]. This CC is unconditionally approved for use in Regulatory Guide (RG) 1.192, Operation and Maintenance Code Case Acceptability, ASME OM Code, Revision 2. The Ginna code of record for the 6th ten-year Inservice Test (IST) Program interval is the ASME OM-2012 Edition. However, CC OMN-13, Revision 2, states in the Applicability section that it is applicable to ASME OM Code 1995 Edition through 2011 Addenda. Ginna will be implementing the ASME OM Code 2012 Edition and also proposes to implement CC OMN-13, Revision 2, for snubbers.

Proposed Alternative

The licensee proposes to use ASME OM Code Case OMN-13, Revision 2, with the 2012 Edition of the ASME OM Code in lieu of the 1995 Edition through 2011 Addenda of the ASME OM Code, as stated in the applicability section of Code Case OMN-13, Revision 2. The proposed

alternative will be utilized for the Ginna snubber inservice examination and testing interval, which is aligned with the Ginna sixth IST 10-year interval.

NRC Staff Evaluation

The 2012 Edition of the ASME OM Code, Section ISTD-4252(c), requires snubber examination intervals following the second refueling outage to be in accordance with intervals specified in Table ISTD-4252-1. The snubber visual examination interval can be extended up to 48 months by meeting the requirements as specified in the Table ISTD-4252-1 and its notes. The ASME OM Code Case OMN-13, Revision 2, allows extension of the visual examination interval beyond the interval allowed in Table ISTD-4252-1. ISTA-3130(b) requires code cases to be applicable to the edition and addenda specified in the test plan. The licensee has proposed to use ASME OM Code Case OMN-13, Revision 2, to extend the visual examination interval beyond the interval allowed by Table ISTD-4252-1 for all snubbers in the snubber programs. Specifically, the licensee proposed to apply ASME OM Code Case OMN-13, Revision 2, to the 2012 Edition of the ASME OM Code in lieu of the 1995 Edition through 2011 Edition, the applicable editions stated in OMN-13, Revision 2.

Application of ASME OM Code cases is addressed in 10 CFR 50.55a(b)(6) through reference to Regulatory Guide 1.192, Revision 2, "Operation and Maintenance Code Case Acceptability, ASME OM Code," which lists acceptable and conditionally acceptable code cases for implementation in the inservice inspection interval for snubber programs. Regulatory Guide 1.192, Revision 2, shows Code Case OMN-13, Revision 2, in Table 1 as acceptable for use without conditions. Code Case OMN-13, Revision 2, was published with the 2012 Edition of the ASME OM Code, and it is applicable to the 1995 Edition through the 2011 Addenda of the ASME OM Code.

There is no technical reason for prohibiting the use of Code Case OMN-13, Revision 2, with the 2012 Edition of the ASME OM Code. The NRC staff's review of the 2012 Edition of the ASME OM Code and Code Case OMN-13, Revision 2, confirmed that there are no changes in the applicable code sections referenced within Code Case OMN-13, Revision 2. The proposed alternative provides an acceptable level of quality and safety for the snubbers. Therefore, the NRC staff concludes that the licensee's proposed alternative is acceptable.

4.0 CONCLUSION

As set forth above, the NRC staff determined that for alternative request SR-1 for Ginna, the proposed alternative provides an acceptable level of quality and safety for the snubbers. Accordingly, the NRC staff concludes that the licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a(z)(1). Therefore, the NRC staff authorizes the use of alternative request SR-1 for the Ginna snubber program, which is aligned with the Ginna sixth 10-year IST interval. The Ginna sixth 10-year IST interval is scheduled to start on January 1, 2020, and end on December 31, 2029.

All other ASME OM Code requirements for which relief was not specifically requested and approved in the subject request for relief remain applicable.

Principal Contributor: G. Bedi

Date: