

From: [Tobin, Jennifer](#)
To: [Helker, David P:\(GenCo-Nuc\)](#)
Cc: [Gropp Jr, Richard W:\(Exelon Nuclear\)](#); [Loomis, Thomas R:\(GenCo-Nuc\)](#)
Subject: Peach Bottom Units 2 and 3 - Request for Additional Information - RR (EPID L-2019-LLR-0103)
Date: Tuesday, March 10, 2020 2:02:00 PM

Dear Mr. Helker,

By letter dated October 31, 2019, Exelon Generation Company, LLC (Exelon, the licensee), submitted relief request (RR) I4R-63 to request relief from the requirements of the American Society of Mechanical Engineers (ASME) Code Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," 2001 Edition, through 2003 Addenda, regarding examination of welds, nozzle inside radius section, and supports at Peach Bottom Atomic Power Station, Units 2 and 3. Specifically, pursuant to Title 10 of the Code of Federal Regulations (10 CFR) 50.55a(g)(5)(iii), the licensee requested relief for the Fourth 10-year In-service Inspection (ISI) interval for items on the basis that the ASME Code requirements are impractical.

In the RR, Essential Service Water (ESW) system seismic restraints component ID 0AP57-SC (PEA-2-656215) and 0BP57-SC (PEA-2-656220) were included as examination requirements deemed impractical with no inspection coverage (0.0%) due to water clarity. The NRC staff has previously granted relief requests for impracticality when ISI was impossible due to design features, when the inspection would require major plant or hardware redesign or modification, or when existing technology will not give meaningful results. Based on the guidance in LIC-102, "Relief Request Reviews," other possible justifications for impracticality include the inspection having high potential to cause a reactor trip, the inspection could cause system or component damage, or the inspection would require replacing equipment or in-line components. The NRC staff has not found any precedent for granting a relief request under 10 CFR 50.55a(g)(5)(iii) for water clarity or surface corrosion on a component.

Based on the information provided in the letter dated October 31, 2019, it is not apparent to the staff that it is not possible to perform VT-3 examination on the seismic restraints without plant modifications or the development of new technology.

The NRC staff has reviewed the information provided by the licensee in the RR and requests the following information to complete the review of the RR.

The steps described in Relief Request I4R-63 appear to be temporary modifications, which do not reach the threshold for impracticality. Please provide additional information for not performing VT-3 examinations by any other means not requiring significant modifications or the development of new technology.

Please submit your response to this request for additional information by April 10th. A clarification call on the draft RAI was held March 10th and resulted in no change to the RAI text.

If you have questions please don't hesitate to contact me.

Thanks!
-Jenny