

From: Wiebe, Joel
Sent: Monday, June 1, 2020 10:05 AM
To: 'Neff, David B:(Exelon Nuclear)'
Subject: Preliminary RAI for Fleet Request to Use Alternative OMN-26

Hi Dave,

We would like to have a clarification call regarding this RAI. Let me know when Exelon is available to discuss.

Joel

In its submittal dated January 31, 2020, Exelon is requesting the implementation of American Society of Mechanical Engineers (ASME) Code Case OMN-26, "Alternate Risk-Informed and Margin Based Rules for Inservice Testing of Motor Operated Valves," for the diagnostic testing intervals for active motor-operated valves (MOVs) as an alternative to the provisions in ASME *Operation and Maintenance of Nuclear Power Plants*, Division 1, OM Code: Section IST (OM Code), 2012 Edition, Mandatory Appendix III, "Preservice and Inservice Testing of Active Electric Motor Operated Valve Assemblies in Light-Water Reactor Power Plants," as incorporated by reference in 10 CFR 50.55a, in accordance with 10 CFR 50.55a(z)(1). Code Case OMN-26 provides separate tables with notes for the diagnostic test intervals for the High Safety Significant Component (HSSC) MOVs and Low Safety Significant Component (LSSC) MOVs. In its submittal, Exelon has combined the OMN-26 tables into one table. It is not clear that the table in the Exelon submittal has accurately included all of the provisions specified in OMN-26 to allow the extended diagnostic test intervals. For example, the HSSC and LSSC tables in OMN-26 specify that to implement the extended diagnostic test intervals allowed in the code case, an MOV must be routinely operated at Design Basis Pressure Conditions with Note (A) in the OMN-26 tables specifying that this routine operation occurs at a periodicity no less frequent than once a refueling outage. The Exelon submittal as detailed in the proposed Exelon table does not appear to include these OMN-26 provisions. Exelon is requested to justify that all of the provisions in both of the OMN-26 tables have been accurately combined into the single table in its submittal, or specify in its submittal that the actual OMN-26 tables will be implemented.

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