Calvert Cliffs Nuclear Power Plant

1650 Calvert Cliffs Parkway
Lusby, Maryland 20657

CENG
a joint venture of
Constellation Energy · EDF

CALVERT CLIFFS
NUCLEAR POWER PLANT

October 18, 2013

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-518
Relief Request for ASME OM Code Pump and Valve Testing Requirements Regarding the Frequency of Inservice Testing

Pursuant to 10 CFR 50.55(a)(3), Calvert Cliffs Nuclear Power Plant, LLC requests Nuclear Regulatory Commission approval of the attached relief request regarding the frequency of inservice tests performed pursuant to the American Society of Mechanical Engineers (ASME) Operations and Maintenance (OM) Code. The Code Edition applicable to Calvert Cliffs for the current (fourth) inservice testing interval, which began on July 1, 2008 is the ASME OM Code 2004 Edition.

The attached request, identified as IST-RR-01, is a request to allow extensions to component test frequencies established in the ASME OM Code, consistent with the provisions of Technical Specification 5.5.8, Inservice Testing Program, and following the guidance of ASME OM Code Case OM-20.

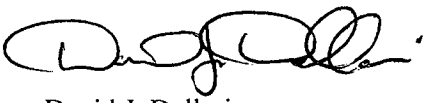
Attachment (1) contains the supporting information regarding the relief request.

There are no regulatory commitments contained in this letter.

A047
LRR

Should you have questions regarding this matter, please contact Mr. Douglas E. Lauver at (410) 495-5219.

Very truly yours,



David J. Dellario
Manager – Engineering Services

DJD/PSF/bjd

Attachment: (1) Relief Request (IST-RR-01)

cc: N. S. Morgan, NRC
W. M. Dean, NRC
Resident Inspector, NRC
S. Gray, DNR

ATTACHMENT (1)

RELIEF REQUEST (IST-RR-01)

Calvert Cliffs Nuclear Power Plant, LLC
October 18, 2013

ATTACHMENT (1)

RELIEF REQUEST (IST-RR-01)

1. ASME Code Component(s) Affected

All pumps and valves contained in the Inservice Testing Program scope.

2. Applicable Code Edition and Addenda

American Society of Mechanical Engineers (ASME) Operations and Maintenance (OM) Code, 2004 Edition.

3. Applicable Code Requirement

This request applies to the frequency specifications of the ASME OM Code. The frequencies for tests given in the ASME OM Code do not include a tolerance band.

Code Paragraph	Description
ISTA-3120(a)	"The frequency for the inservice testing shall be in accordance with the requirements of Section IST."
ISTB-3400	Frequency of Inservice Tests
ISTC-3510	Exercising Test Frequency
ISTC-3540	Manual Valves
ISTC-3630(a)	Frequency
ISTC-3700	Position Verification Testing
ISTC-5221(c)(3)	"At least one valve from each group shall be disassembled and examined at each refueling outage; all valves in a group shall be disassembled and examined at least once every 8 years."
Appendix I, I-1320	Test Frequencies, Class 1 Pressure Relief Valves
Appendix I, I-1330	Test Frequencies, Class 1 Nonreclosing Pressure Relief Devices
Appendix I, I-1340	Test Frequencies, Class 1 Pressure Relief Valves that are used for Thermal Relief Application
Appendix I, I-1350	Test Frequencies, Class 2 and 3 Pressure Relief Valves
Appendix I, I-1360	Test Frequencies, Class 2 and 3 Nonreclosing Pressure Relief Devices
Appendix I, I-1370	Test Frequencies, Class 2 and 3 Primary Containment Vacuum Relief Valves
Appendix I, I-1380	Test Frequencies, Class 2 and 3 Vacuum Relief Valves except for Primary Containment Vacuum Relief Valves
Appendix I, I-1390	Test Frequencies, Class 2 and 3 Pressure Relief Valves that are used for Thermal Relief Application
Appendix II, II-4000(a)(1)	Performance Improvement Activities Interval
Appendix II, II-4000(b)(1)(e)	Optimization of Condition Monitoring Activities Interval

4. Reason for Request

Pursuant to 10 CFR 50.55a, "Codes and Standards," paragraph (a)(3)(ii), an alternative is being requested from the frequency specifications of ASME OM Code. The basis of the alternative request is that the Code requirement presents an undue hardship without a compensating increase in the level of quality or safety.

The ASME OM Code, Section IST, establishes the inservice test frequency for all components within the scope of the Code. The frequencies (e.g., quarterly) have been interpreted as "nominal"

frequencies [generally as defined in Table 3.2 of NUREG-1482 (Reference 1)] and owners routinely applied the surveillance extension time period (i.e., grace period) contained in the plant Technical Specifications (TSs) Surveillance Requirements (SRs). The TSs typically allow for $\leq$ 25% extension of the surveillance test interval to accommodate plant conditions that may not be suitable for conducting the surveillance (TS SR 3.0.2). However, regulatory issues have been raised (Reference 2) concerning the applicability of SR 3.0.2 to ASME OM Code required inservice test frequencies. Reference 2 states that SR 3.0.2 and 3.0.3 cannot be applied to TS 5.5, Programs and Manuals, for tests that are not associated with a TS SR.

The lack of a tolerance band on the ASME OM Code IST frequency restricts operational flexibility. There may be a conflict where a surveillance test could be required (i.e., its Frequency could expire), but where it is not possible or not desired that it be performed until sometime after a plant condition or associated Limiting Condition for Operation is within its applicability.

The Nuclear Regulatory Commission (NRC) recognized this potential issue in the TSs by allowing a frequency tolerance as described in TS SR 3.0.2. The lack of a similar tolerance applied to OM Code testing places an unusual hardship on the plant to adequately schedule work tasks without operational flexibility.

Thus, just as with TS-required surveillance testing, some tolerance is needed to allow adjusting OM Code testing intervals to suit the plant conditions and other maintenance and testing activities. This assures operational flexibility when scheduling surveillance tests and minimizes conflict between the need to complete the surveillance and plant conditions.

5. Proposed Alternative and Basis for Use

The proposed alternative is to allow extensions to ASME OM Code component test frequencies using the ASME-approved Code Case OMN-20, Inservice Test Frequency (Reference 3). This code case was approved by the ASME OM Code Standards Committee in February 2012.

6. Duration of Proposed Alternative

This proposed alternative will be utilized for the remainder of the Calvert Cliffs fourth 10-year Inservice Testing interval, which began on July 1, 2008 and will end on June 30, 2018.

7. Precedents

The proposed alternative request for Calvert Cliffs is similar to the following approved alternative/relief request shown below:

1) Alternative Request RV-01 was approved by the NRC for Quad Cities Units 1 and 2 on February 14, 2013 (ADAMS Accession No. ML13042A348)

8. References

1. NUREG-1482, Revision 1, Guidelines for Inservice Testing at Nuclear Power Plants
2. Regulatory Issue Summary 2012-10, NRC Staff Position on Applying Surveillance Requirements 3.0.2 and 3.0.3 to Administrative Controls Program Tests
3. ASME Code Case OMN-20, Inservice Test Frequency