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10 CFR 50.55a

RS-19-015

January 31, 2019

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

Braidwood Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and STN 50-457

Subject: Braidwood Station Relief Request I4-RS-1 to Implement Code Case OMN-13

American Society of Mechanical Engineers (ASME) has approved Code Case (CC) OMN-13, "Performance-Based Requirements for Extending Snubber Inservice Visual Examination Intervals," Revision 2. This CC is unconditionally approved for use in Regulatory Guide (RG) 1.192, "Operation and Maintenance Code Case Acceptability, ASME OM Code," Revision 2. However, CC OMN-13, Revision 2, states in the Applicability section that it is applicable to ASME OM Code 1995 Edition through 2011 Addenda.

After the fall 2018 refueling outage, Braidwood Station, Units 1 and 2, entered the fourth ISI/snubber inspection interval and implemented the ASME Code OM-2012 Edition and proposes to also implement CC OMN-13, Revision 2, for extending the examination interval for snubbers. Since the use of CC OMN-13 is not yet approved for use with the ASME OM Code, 2012 Edition, a relief request is being submitted to allow authorization to use CC OMN-13, Revision 2, for Braidwood Station, Units 1 and 2.

The attached relief request addresses potential inspections that would be performed during a refueling outage within the fourth ISI/snubber interval for Braidwood Station, Units 1 and 2. The fourth interval of the Braidwood Station Unit 1 ISI Program started on August 29, 2018 and will end on July 28, 2028. The fourth interval of the Braidwood Station Unit 2 ISI Program started on November 5, 2018 and will end on October 16, 2028.

EGC requests approval of the proposed relief request by September 10, 2019, prior to the beginning of the Braidwood Station Unit 1 fall 2019 refueling outage (A1R21).

There are no regulatory commitments contained in this letter.

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If you have any questions regarding this matter, please contact Ms. Lisa A. Simpson at (630) 657-2815.

Respectfully,

A handwritten signature in black ink, appearing to read "D. Gullott", with a long horizontal line extending to the right.

David M. Gullott
Director - Licensing
Exelon Generation Company, LLC

Attachment: 10 CFR 50.55a Relief Request I4-RS-1

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Braidwood Station
Illinois Emergency Management Agency – Division of Nuclear Safety

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Request for Relief
Proposed Alternative to Implement Code Case (CC) OMN-13
In Accordance with 10 CFR 50.55a(z)(1)

1.0 ASME CODE COMPONENT(S) AFFECTED

Component Numbers: Braidwood Station, Units 1 and 2,
All snubbers within the scope of the Snubber Program.

Description: Alternative Requirements for Extending Snubber Inservice
Visual Examination Intervals

Code Class: 1, 2, 3, MC, and Non-Safety Related Snubbers that are
Important to Safety

Examination Category: ISTD-4200

Drawing Numbers: Various

2.0 APPLICABLE CODE EDITION AND ADDENDA

American Society of Mechanical Engineers (ASME) Code for Operation and
Maintenance of Nuclear Power Plants (OM Code) 2012 Edition with no Addenda.

3.0 APPLICABLE CODE REQUIREMENT

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

4.0 REASON FOR THE REQUEST

Pursuant to 10 CFR 50.55a, *Codes and standards*, paragraph (z)(1), an alternative is
proposed to ISTA-3130(b) requirements for implementing Code Case (CC) OMN-13,
*Performance-Based Requirements for Extending Snubber Inservice Visual Examination
Intervals at LWR Power Plants*, Revision 2. The basis of the request is that the
proposed alternative would provide an acceptable level of quality and safety.

ISTA-3130(b) states, "Code Cases shall be applicable to the edition and addenda
specified in the test plan." ASME has approved CC OMN-13, Revision 2. 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 Braidwood
Station code of record for the fourth interval for Unit 1 and Unit 2 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. Braidwood Station
implemented the ASME Code OM-2012 Edition and proposed to also implement CC
OMN-13, Revision 2, for extending the examination interval for snubbers.

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Braidwood Station used CC OMN-13, Revision 0, during the previous Inservice Inspection (ISI) ten-year interval for both Units 1 and 2 and proposes to implement Revision 2 of this CC for the subsequent snubber ISI ten-year interval. Based on the required update of the ISI program and 10 CFR 50.55a(b)(3)(v), OM Condition: Snubbers ISTD, item (B), requirements for snubbers are moving from Section XI to the OM Code and hence this CC OMN-13 request is associated with the fourth Snubber ISI ten-year interval.

5.0 **PROPOSED ALTERNATIVE AND BASIS FOR USE**

The requested proposed alternative to ISTA-3130(b) is to implement this CC since the CC Applicability statement covers only the 1995 Edition through the 2011 Addenda and ISTA-3130(b) requires applicability to the edition specified in the test plan, which is the ASME OM-2012 Edition. A review of the 2012 Edition of the OM Code and CC OMN-13, Revision 2, confirmed that there are no changes in the applicable Code sections referenced within the CC when comparing the 2011 Addenda to the 2012 Edition.

RG 1.192, Revision 2, Table 1, "Acceptable OM Code Cases," lists CC OMN-13, Revision 2 (2012 Edition) as acceptable to the NRC for application in a licensee's IST program without conditions. Note that for Braidwood Station, snubbers have historically been included in the ISI program in accordance with Technical Requirements Manual (TRM) TLCO 3.7.b, "Snubbers."

Using the provisions of this request as an alternative to the requirements of ISTA-3130(b) will provide adequate detection of observable snubber degradation and, along with the testing and service life monitoring requirements of Subsection ISTD, will continue to provide reasonable assurance of the operational readiness of Braidwood Station snubbers. Therefore, the proposed alternative provides an acceptable level of quality and safety pursuant to 10 CFR 50.55a(z)(1).

6.0 **DURATION OF THE PROPOSED ALTERNATIVE**

The duration of the proposed alternative is for the Braidwood Station Unit 1 and 2 Fourth Inservice Inspection Interval.

The Fourth Inservice Inspection Interval for Braidwood Station Unit 1 started on August 29, 2018 and will end on July 28, 2028.

The Fourth Inservice Inspection Interval for Braidwood Station Unit 2 started on November 5, 2018 and will end on October 16, 2028.

7.0 **PRECEDENTS**

On December 10, 2018 (Reference 3), the NRC provided their authorization of a relief request associated with snubber examination for the fifth and fourth ten-year IST Intervals for Nine Mile Point Nuclear Station, Units 1 and 2, respectively.

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8.0 REFERENCES

- 1) Code Case OMN-13, "Performance-Based Requirements for Extending Snubber Inservice Visual Examination Intervals," Revision 2
- 2) RG 1.192, "Operation and Maintenance Code Case Acceptability, ASME OM Code, Revision 2," dated March 2017; published January 2018 (ADAMS Accession No. ML16321A337)
- 3) Letter from J. G. Danna (U.S. Nuclear Regulatory Commission) to B. C. Hanson (Exelon Generation Company, LLC), "Nine Mile Point Nuclear Station, Units 1 and 2 – Issuance of Relief Request Re: Use of ASME Code Case OMN-13 in Lieu of Specific ASME Code Requirements (EPID L-2018-LLR-0052)," dated December 10, 2018 (ADAMS Accession No. ML18318A422)