



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

November 6, 2014

Mr. Michael P. Gallagher
Vice President, License Renewal Projects
Exelon Generation Company, LLC
200 Exelon Way
Kennett Square, PA 19348

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE BYRON STATION, UNITS 1 AND 2, AND BRAIDWOOD STATION, UNITS 1 AND 2, LICENSE RENEWAL APPLICATION, SET 44 (TAC NOS. MF1879, MF1880, MF1881, AND MF1882)

Dear Mr. Gallagher:

By letter dated May 29, 2013, Exelon Generation Company, LLC, submitted an application pursuant to Title 10 of the *Code of Federal Regulations* Part 54, to renew the operating licenses NPF-37, NPF-66, NPF-72, and NPF-77 for Byron Station, Units 1 and 2, and Braidwood Station, Units 1 and 2, respectively, for review by the U.S. Nuclear Regulatory Commission (NRC or the staff). The staff is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete the review.

These requests for additional information were discussed with John Hufnagel, and a mutually agreeable date for the response is 30 days from the date of this letter. If you have any questions, please contact me at 301-415-4115 or e-mail Lindsay.Robinson@nrc.gov.

Sincerely,

/RA/

Lindsay R. Robinson, Project Manager
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-454, 50-455, 50-456, and 50-457

Enclosure:
Request for Additional Information

cc w/ encl: Listserv

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Vice President, License Renewal Projects
Exelon Generation Company, LLC
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DATE	10/31/14	11/5/14	11/6/14	11/6/14

OFFICIAL RECORD COPY

Letter to M.P. Gallagher from Lindsay R. Robinson dated November 6, 2014

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AND 2, LICENSE RENEWAL APPLICATION, SET 44 (TAC NOS. MF1879,
MF1880, MF1881, AND MF1882)

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BYRON STATION, UNITS 1 AND 2,
AND BRAIDWOOD STATION, UNITS 1 AND 2,
LICENSE RENEWAL APPLICATION
REQUEST FOR ADDITIONAL INFORMATION, SET 44
(TAC NOS. MF1879, MF1880, MF1881, MF1882)

RAI B.2.1.30-6

Applicability:

Byron Station and Braidwood Station (BBS), all units

Background:

ASME Code Section XI, Subsection IWL, sub-article IWL-2310 requires that general visual examinations of concrete surfaces shall be performed, directly or remotely, in sufficient detail to identify areas of concrete deterioration and distress, such as described in ACI 201.1R and ACI 349.3R. GALL Report Aging Management Program (AMP) XI.S2, "ASME Section XI, Subsection IWL," states that "[q]uantitative acceptance criteria based on the 'Evaluation Criteria' provided in Chapter 5 of ACI 349.3R also may be used to augment the qualitative assessment of the Responsible Engineer." To demonstrate consistency with the GALL Report, LRA Section B.2.1.30, "ASME Section XI, Subsection IWL" includes enhancements to the program (Commitment No. 30) to (1) explicitly require that areas of concrete deterioration and distress be recorded in accordance with the guidance provided in ACI 349.3R and (2) include the quantitative acceptance criteria in Chapter 5 of ACI 349.3R and use it to augment the qualitative assessment of the Responsible Engineer consistent with GALL Report AMP XI.S2.

However, during NRC Regional 71002 inspections in support of the review of the BBS LRA, the inspection team noted that visual inspections of areas of concrete deterioration are taken at a distance with the use of a telescope. The inspection team expressed concern regarding the applicant's visual resolution capability to be used during the period of extended operation, to quantify degradation based on quantitative acceptance criteria described in Chapter 5 of ACI 349.3R.

Issue:

It is not clear what visual resolution capabilities will be used for concrete surface examination during the period of extended operation to ensure methods and equipment will provide sufficient quantitative measurements to evaluate against the quantitative criteria in ACI 349.3R.

Request:

Provide information to verify that sufficient visual resolution capability will be used during visual examinations of concrete surfaces of containment structures to detect and quantify forms of degradation for comparison against quantitative acceptance criteria based on Chapter 5 of ACI 349.3R.

ENCLOSURE