## **NRR-PMDAPEm Resource**

From: Wiebe, Joel

**Sent:** Monday, March 23, 2015 9:50 AM

To: Jessica Krejcie
Cc: Joseph Bauer

Subject: Preliminary RAI Regarding Braidwood and Byron Stations Relief Request for Alternative

Requirements for the Repair of Reactor Vessel Head Penetrations

This is a preliminary RAI. The NRC staff would like to schedule a conference call to discuss this RAI within the next two weeks.

In a letter dated September 4, 2014, (Agencywide Documents Access and Management System (ADAMS) Accession Number ML14251A536), Exelon Generation Company, LLC (EGC) submitted a revision to the Third 10-Year Inservice Inspection Interval Requests for Relief for Alternative Requirements for the Repair of Reactor Vessel Head Penetrations at Braidwood Station, Units 1 and 2 and Byron Station, Units 1 and 2.

During its review of EGC's letter, the NRC staff determined that the following information is needed to complete its review.

The NRC staff needs to make a finding that the proposed alternative provides an acceptable level of quality and safety in order to authorize the alternative. The NRC authorization of the embedded flaw repair technique by letter dated March 29, 2012, (ADAMS Accession No. ML120790647) was a temporary repair technique with known issues that require reinspection each refueling outage to verify a continuing acceptable level of quality and safety. The NRC staff has reviewed the technical justification provided in your submittal. However, additional operating experience appears necessary to make a finding that the level of quality and safety is acceptable.

Provide operating experience with repaired penetrations that have been in service for at least 4 cycles (4 sets of examinations) that demonstrate that the current specified PT examinations are not required to maintain an acceptable level of quality and safety.

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