



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

November 13, 2017

LICENSEE: Exelon Generation Company, LLC.

FACILITY: Dresden Nuclear Power Station, Units 2 and 3

SUBJECT: SUMMARY OF TELECONFERENCE ON NOVEMBER 9, 2017, REGARDING VERBAL AUTHORIZATION OF RELIEF REQUEST TO USE ALTERNATIVE FOR DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3 (EPID: L-2017-LLR-0136)

On November 9, 2017, a teleconference was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Exelon Generation Company, LLC. (the licensee). The purpose of the call was to discuss the licensee's emergent request, submitted by letter dated November 7, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17312A293), to use an alternative to the American Society of Mechanical Engineers (ASME) Code, Section XI. The licensee proposed to implement an alternative inspection program developed by the Performance Demonstration Initiative (PDI) and described in ASME Code Case N-653-1, "Qualification Requirements for Full Structural Overlaid Wrought Austenitic Piping Welds." The licensee's proposed alternative includes the use of the PDI program for the inspection of the weld overlay for weld JP1A/N20A-6 at a Dresden, Unit 2 reducer-to-pipe butt-weld in the "A" jet pump instrumentation loop header. The proposed alternative is also applicable for other weld overlaid class 1 piping at Dresden, Units 2 and 3, for the duration of the fifth ten-year inservice inspection interval (ISI), currently scheduled to end for both units on January 19, 2023.

The NRC staff reviewed the licensee's submittal and determined that the proposed alternative provides reasonable assurance of structural integrity of the subject piping. During the teleconference, at approximately 10:30 a.m., Eastern Time, November 9, 2017, the NRC staff granted verbal authorization to the licensee to use the proposed alternative in accordance with Title 10 of the *Code of Federal Regulations* Section 50.55a(z)(1). A copy of the NRC staffs verbal authorization is enclosed.

Teleconference attendees included the following:

NRC

David Wrona, Chief, Plant Licensing Branch III, Division of Operating Reactor Licensing (DORL)
Russell Haskell, Project Manager, DORL
David Alley, Chief, Piping and Head Penetration Branch (MPHB)
John Tsao, Senior Materials Engineer, MPHB
Stephen Cumblidge, Materials Engineer, MPHB
John Rutkowski, Project Engineer, Region III
Mel Homberg, Senior Reactor Inspector, Region III
Vijay Meghani, Resident Inspector, Region III

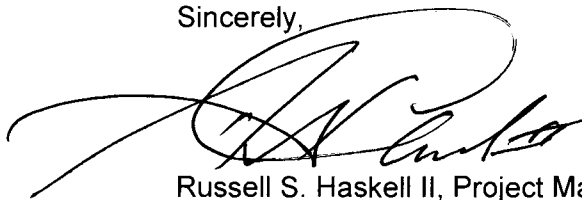
Gregory Roach, Senior Resident Inspector, Dresden
Elba Sanchez Santiago, Resident Inspector, Region III
Lionel Rodriguez, Resident Inspector, Region III

EXELON

Glen Kaegi, Director Corporate Licensing and Regulatory Affairs, Midwest
Patrick Simpson, Manager, Corporate Licensing, Midwest
Ken Nicely, Corporate Licensing, Midwest
Mitchel Mathews, Corporate Licensing, Midwest
Bruce Franzen, Dresden Regulatory Assurance Manager
John Kish, Dresden Inservice Inspection Program Manager
Brendan Casey, Braidwood Inservice Inspection Program
Jay Miller, Exelon Non-Destructive Examination Programs
David Anthony, Exelon Non-Destructive Examination Programs
Kevin Hall, LaSalle Non-Destructive Examination Programs
David Waskey, AREVA ASME Section XI Programs

If you have any questions, please contact me at (301) 415-1129 or via e-mail at Russell.Haskell@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Russell S. Haskell II", with a large, sweeping flourish extending to the left.

Russell S. Haskell II, Project Manager
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-237 and 50-249

Enclosure:
Verbal Authorization

cc w/encl: Distribution via Listserv

VERBAL AUTHORIZATION BY
THE OFFICE OF NUCLEAR REACTOR REGULATION
FOR RELIEF REQUEST I5R-16
ALTERNATIVES TO THE REQUIREMENTS OF APPENDIX VIII, SUPPLEMENT 11
OF ASME SECTION XI, 2007 EDITION 2008 ADDENDA FOR CLASS 1 PIPING
DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3
EXELON GENERATION COMPANY, LLC.
DOCKET NOS. 50-237 AND 50-249
NOVEMBER 9, 2017

Technical Evaluation read by David Alley, Chief of the Piping and Head Penetration Branch, NRR

By letter dated November 7, 2017, Exelon Generation Company (the licensee) requested relief from the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, 2007 Edition and 2008 Addenda, Appendix VIII, Supplement 11, for ASME Code, weld overlaid Class 1 piping at the Dresden Nuclear Power Station, Units 2 and 3.

Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(z)(1), the licensee submitted Relief Request I5R-16 to propose an alternative to ASME Code, Section XI, Appendix VIII, Supplement 11 requirements for weld overlaid Class 1 piping on the basis that the proposed alternative provides an acceptable level of quality and safety.

On November 6, 2017, the licensee identified two circumferential and one axial flaw on weld JP1A/N20A-6 which is a reducer-to-pipe weld in the "A" jet pump instrumentation loop header. The licensee proposed to install a full structural weld overlay on the existing piping weld using the ASME Code, Section XI.

In assessing this repair, the licensee determined that it could not comply with the requirements of the ASME Code, Section XI, 2007 Edition and 2008 Addenda, Appendix VIII, Supplement 11, "Qualification Requirements for Full Structural Overlaid Wrought Austenitic Piping Welds." As an alternative to the ASME Code requirements the licensee proposed to implement an alternative inspection program developed by the Performance Demonstration Initiative (PDI) and described in ASME Code Case N-653-1, "Qualification Requirements for Full Structural Overlaid Wrought Austenitic Piping Welds." The licensee proposed the use of the PDI program for the inspection of the weld overlay for Weld JP1A/N20A-6 as well as other weld overlaid class 1 piping at Dresden, Units 2 and 3 for the duration of the fifth ten-year inspection intervals at each plant.

Enclosure

The NRC staff finds that the licensee provided sufficient basis to demonstrate that the use of the proposed PDI program as proposed by the licensee and as described in ASME Code Case N-653-1 is acceptable for the inspection of weld overlaid Class 1 piping at Dresden, Units 2 and 3 including weld JP1A/N20A-6 following the weld overlay that is currently planned. Additionally, the NRC staff notes that ASME Code Case N-653-1 is included in the draft revision 18 of Regulatory Guide 1.147 without conditions. Therefore, the NRC finds that Relief Request I5R-16 will provide reasonable assurance that the structural integrity of the weld overlaid Class 1 piping including the subject butt-weld is acceptable during the time period for which the alternative has been proposed.

Authorization read by David Wrona, Branch Chief of the Plant Licensing Branch III, NRR

As Branch Chief of the Plant Licensing Branch III, Office of Nuclear Reactor Regulation, I agree with the conclusions of the Piping and Head Penetration Branch.

The NRC staff concludes that the proposed alternative provides reasonable assurance of structural integrity. As such, the NRC staff finds that the alternate repair provides an acceptable level of quality and safety. Accordingly, the NRC staff concludes that the licensee has adequately addressed all of the regulatory requirements set forth in 10 CFR 50.55a (z)(1). Therefore, as of November 9, 2017, the NRC authorizes the use of Relief Request I5 R-16 at Dresden Nuclear Power Station, Units 2 and 3 for the fifth 10-Year ISI interval.

The authorization of this relief request does not imply or infer the NRC approval of ASME Code Case N-653-1 for generic use.

All other requirements in ASME Code, Section XI, for which relief was not specifically requested and approved in this relief request remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

This verbal authorization does not preclude the NRC staff from asking additional clarification questions regarding the Relief Request while preparing the subsequent written safety evaluation.

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ADAMS Accession No. ML17317A900

*by email

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