



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

January 2, 2019

LICENSEE: EXELON GENERATION COMPANY, LLC

FACILITIES: CLINTON POWER STATION, UNIT NO. 1; DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3; JAMES A. FITZPATRICK NUCLEAR POWER PLANT; LASALLE COUNTY STATION, UNITS 1 AND 2; LIMERICK GENERATING STATION, UNITS 1 AND 2; NINE MILE POINT NUCLEAR STATION, UNITS 1 AND 2; PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3; AND QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2

SUBJECT: SUMMARY OF DECEMBER 19, 2018, MEETING WITH EXELON GENERATION COMPANY, LLC REGARDING THE USE OF BOILING WATER REACTOR VESSEL AND INTERNALS PROJECT GUIDELINES (EPID L-2018-LRM-0084)

On December 19, 2018, a Category 1 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of Exelon Generation Company, LLC (Exelon, the licensee). The purpose of the meeting was to discuss the potential use of new editions of Boiling Water Reactor (BWR) Vessel and Internals Project (BWRVIP) guidelines at Exelon's BWR facilities. The meeting notice and agenda are available in Agencywide Documents Access and Management System (ADAMS) at Accession No. ML18348A416. A copy of Exelon's presentation is available in ADAMS at Accession No. ML18347B314. A list of attendees is enclosed.

Exelon stated that all of its BWRs have been approved to perform BWRVIP inspections in lieu of certain inspections required by the American Society for Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code). The NRC staff has generically approved BWRVIP guidelines through the topical report process. However, in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a, "Codes and standards," licensees must obtain plant-specific NRC approval to use the BWRVIP guidelines as an alternative to the ASME Code requirements. These plant-specific alternatives to the ASME Code refer to specific versions of the BWRVIP guidelines.

The NRC has generically approved revisions to some of the BWRVIP guidelines. Exelon would like to use these NRC-approved revisions, but was concerned that the approved alternatives would prevent them from adopting the revisions without seeking NRC approval. Exelon noted that BWRVIP-94, which has not been approved by the NRC, provides guidelines for implementing revised guidance, but it does not address NRC approval of alternatives.

The NRC staff stated that approved alternatives have allowed the use of specific versions of the BWRVIP guidelines. Although a change control process could be developed to permit the limited use of revised versions of the BWRVIP guidelines, the staff stated that this was not likely to be easy to develop or efficient to use. The staff stated that it would be simpler for the

licensee to update its previously approved alternative requests by identifying the revised BWRVIP documents that will be adopted. As this would be limited to BWRVIP versions that are already approved through the topical report process, the revised alternative request should be limited in scope and time to review. The staff can rely on its past approval, which would still be valid, and focus only on the changes.

The licensee also noted that BWRVIP-94 is being revised. A representative of the Electric Power Research Institute noted that a copy of the revision would be sent to the NRC for information.

Public meeting feedback forms were not received. Please direct any inquiries to me at 301-415-1380, or [Blake.Purnell@nrc.gov](mailto:Blake.Purnell@nrc.gov).



Blake Purnell, Project Manager  
Plant Licensing Branch III  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-461, 50-237, 50-249, 50-333,  
50-373, 50-374, 50-352, 50-353,  
50-220, 50-410, 50-277, 50-278,  
50-254, and 50-265

Enclosure:  
List of Attendees

cc: Listserv

LIST OF ATTENDEES

DECEMBER 19, 2018, MEETING WITH EXELON GENERATION COMPANY, LLC

<b>Name</b>	<b>Affiliation</b>
Blake Purnell	NRC
David Alley	NRC
Jeff Poehler	NRC
Ganesh Cheruvenki	NRC
Simon Sheng	NRC
James Medoff	NRC
David Rudland	NRC
Thomas Loomis	Exelon
Will Carsky	Exelon
Randal Schmidt	Exelon
Todd Sherman	Entergy
Steven Richter	Energy-Northwest

Enclosure

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REACTOR VESSEL AND INTERNALS PROJECT GUIDELINES (EPID L-2018-  
LRM-0084) DATED JANUARY 2, 2019

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JJohnston, NRR  
LBurkhart, EDO  
SSheng, NRR  
JPoehler, NRR  
GCheruvenci, NRR  
JMedoff, NRR  
DRudland, NRR

**ADAMS Accession No.** Package ML18354B182  
Meeting Notice ML18348A416  
Meeting Summary ML18354B171

\*By Email

OFFICE	NRR/DORL/LPL3/PM	NRR/DORL/LPL3/LA	NRR/DMLR/MPHB/BC	NRR/DORL/LPL3/BC	NRR/DORL/LPL3/PM
NAME	BPurnell	SRohrer	DAlley*	DWrona	BPurnell
DATE	1/2/19	1/2/19	1/2/19	1/2/19	1/2/19

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