

10 CFR 50.55a

RS-18-065  
NMP1L3289  
JAFP-19-0057  
TMI-19-060

June 4, 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

Byron Station, Units 1 and 2  
Renewed Facility Operating License Nos. NPF-37 and NPF-66  
NRC Docket Nos. STN 50-454 and STN 50-455

Calvert Cliffs Nuclear Power Plant, Units 1 and 2  
Renewed Facility Operating License Nos. DPR-53 and DPR-69  
NRC Docket Nos. 50-317 and 50-318

Clinton Power Station, Unit 1  
Facility Operating License No. NPF-62  
NRC Docket No. 50-461

Dresden Nuclear Power Station, Units 2 and 3  
Renewed Facility Operating License Nos. DPR-19 and DPR-25  
NRC Docket Nos. 50-237 and 50-249

James A. FitzPatrick Nuclear Power Plant  
Renewed Facility Operating License No. DPR-59  
NRC Docket No. 50-333

LaSalle County Station, Units 1 and 2  
Renewed Facility Operating License Nos. NPF-11 and NPF-18  
NRC Docket Nos. 50-373 and 50-374

Limerick Generating Station, Units 1 and 2  
Renewed Facility Operating License Nos. NPF-39 and NPF-85  
NRC Docket Nos. 50-352 and 50-353

Nine Mile Point Nuclear Station, Units 1 and 2  
Renewed Facility Operating License Nos. DPR-63 and NPF-69  
NRC Docket Nos. 50-220 and 50-410

Peach Bottom Atomic Power Station, Units 2 and 3  
Renewed Facility Operating License Nos. DPR-44 and DPR-56  
NRC Docket Nos. 50-277 and 50-278

Quad Cities Nuclear Power Station, Units 1 and 2  
Renewed Facility Operating License Nos. DPR-29 and DPR-30  
NRC Docket Nos. 50-254 and 50-265

R. E. Ginna Nuclear Power Plant  
Renewed Facility Operating License No. DPR-18  
NRC Docket No. 50-244

Three Mile Island Nuclear Station, Unit 1  
Renewed Facility Operating License No. DPR-50  
NRC Docket No. 50-289

Subject: Response to Request for Additional Information - Proposed Alternative to Utilize Code Cases N-878 and N-880

- References:
- 1) Letter from J. Barstow (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Proposed Alternative to Utilize Code Cases N-878 and N-880," dated May 30, 2018
  - 2) Letter from B. Purnell (U.S. Nuclear Regulatory Commission) to B. Hanson (Exelon Generation Company, LLC), Supplemental Information Needed for Acceptance of Requests to Use ASME Code Cases N-878, N-879, and N-880, dated July 10, 2018
  - 3) Letter from J. Barstow (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Proposed Alternatives to Utilize Code Cases N-878, N-879, and N-880," dated July 26, 2018
  - 4) Email from B. Purnell (U.S. Nuclear Regulatory Commission) to T. Loomis (Exelon Generation Company, LLC), "Exelon Generation Company, LLC - Fleet Request to use ASME Code Cases N-878 and N-880 (EPID L-2018-LLR-0077)," dated December 11, 2018
  - 5) Letter from J. Barstow (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Response to Request for Additional Information - Proposed Alternative to Utilize Code Cases N-878 and N-880," dated January 8, 2019

- 6) Email from B. Purnell (U.S. Nuclear Regulatory Commission) to T. Loomis (Exelon Generation Company, LLC), "Exelon Generation Company, LLC - Fleet Request to use ASME Code Cases N-878 and N-880 (EPID L-2018-LLR-0077)," dated April 24, 2019
- 7) Letter from J. Barstow (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Response to Request for Additional Information - Proposed Alternative to Utilize Code Cases N-878 and N-880," dated May 1, 2019
- 8) Email from B. Purnell (U.S. Nuclear Regulatory Commission) to T. Loomis (Exelon Generation Company, LLC), "Exelon Generation Company, LLC - Request for Additional Information Regarding Fleet Request to use ASME Code Cases N-878 and N-880 (EPID L-2018-LLR-0077)," dated May 22, 2019

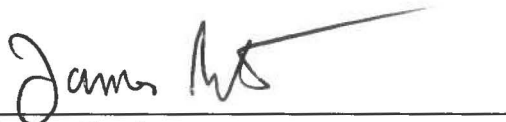
In the Reference 1 letter, in accordance with 10 CFR 50.55a(z)(2), Exelon Generation Company, LLC (Exelon) requested proposed alternatives to the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," on the basis that compliance with the code results in hardship without a compensating increase in quality. Specifically, these proposed alternatives requested the use of Code Case N-878 ("Alternative to QA Program Requirements of IWA-4142 Section XI, Division 1") and N-880 ("Alternative to Procurement Requirements of IWA-4143 for Small Nonstandard Welded Fittings Section XI, Division 1"), which address the procurement of material from a material supplier that does not possess ASME accreditation as a Quality System Certificate Holder or an NPT Certificate Holder.

In the Reference 8 email, the U.S. Nuclear Regulatory Commission requested additional information. Attached is our response.

There are no regulatory commitments contained in this letter.

If you have any questions, please contact Tom Loomis (610) 765-5510.

Respectfully,



James Barstow  
Director - Licensing and Regulatory Affairs  
Exelon Generation Company, LLC

Attachment: Response to Request for Additional Information - Proposed Alternative to Utilize Code Cases N-878 and N-880

cc: Regional Administrator - NRC Region I  
Regional Administrator - NRC Region III  
NRC Senior Resident Inspector - Braidwood Station  
NRC Senior Resident Inspector - Byron Station  
NRC Senior Resident Inspector - Calvert Cliffs Nuclear Power Plant  
NRC Senior Resident Inspector - Clinton Power Station  
NRC Senior Resident Inspector - Dresden Nuclear Power Station  
NRC Senior Resident Inspector - James A. FitzPatrick Nuclear Power Plant  
NRC Senior Resident Inspector - LaSalle County Station  
NRC Senior Resident Inspector - Limerick Generating Station  
NRC Senior Resident Inspector - Nine Mile Point Nuclear Station  
NRC Senior Resident Inspector - Peach Bottom Atomic Power Station  
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station  
NRC Senior Resident Inspector - R. E. Ginna Nuclear Power Plant  
NRC Senior Resident Inspector - Three Mile Island Nuclear Station, Unit 1  
NRC Project Manager - Braidwood Station  
NRC Project Manager - Byron Station  
NRC Project Manager - Calvert Cliffs Nuclear Power Plant  
NRC Project Manager - Clinton Power Station  
NRC Project Manager - Dresden Nuclear Power Station  
NRC Project Manager - James A. FitzPatrick Nuclear Power Plant  
NRC Project Manager - LaSalle County Station  
NRC Project Manager - Limerick Generating Station  
NRC Project Manager - Nine Mile Point Nuclear Station  
NRC Project Manager - Peach Bottom Atomic Power Station  
NRC Project Manager - Quad Cities Nuclear Power Station  
NRC Project Manager - R. E. Ginna Nuclear Power Plant  
NRC Project Manager - Three Mile Island Nuclear Station, Unit 1  
Illinois Emergency Management Agency - Department of Nuclear Safety  
R. R. Janati - Bureau of Radiation Protection, Commonwealth of Pennsylvania  
D. A. Tancabel - State of Maryland  
A. L. Peterson - NYSERDA

**Attachment**

**Response to Request for Additional Information - Proposed Alternative to Utilize Code  
Cases N-878 and N-880**

**Question:**

For each plant, either (1) limit the scope of the request to the current 10-year inservice test interval or (2) identify the specific ASME Code edition and addenda applicable to future 10-year inservice test intervals in which the proposed alternative will be used. In addition, provide a basis for each plant where use of the alternative is requested beyond the current interval.

**Response:**

The subject relief will be limited to a 10-year inservice inspection intervals as shown below.

<u>PLANT</u>	<u>INTERVAL</u>	<u>EDITION</u>	<u>START</u>	<u>END</u>
Braidwood Station, Units 1 and 2	Fourth	2013 Edition	August 29, 2018 October 17, 2018	July 28, 2028 October 16, 2028
Byron Station, Units 1 and 2	Fourth	2007 Edition, through 2008 Addenda	July 16, 2016	July 15, 2025
Calvert Cliffs Nuclear Power Plant, Units 1 and 2	Fifth	2013 Edition	July 1, 2019	June 30, 2029
Clinton Power Station, Unit 1	Third	2004 Edition	July 1, 2010	June 30, 2020
Clinton Power Station, Unit 1	Fourth	2013 Edition	July 1, 2020	June 30, 2030
Dresden Nuclear Power Station, Units 2 and 3	Fifth	2007 Edition, through 2008 Addenda	January 20, 2013	January 19, 2023
James A. FitzPatrick Nuclear Power Plant	Fifth	2007 Edition, through 2008 Addenda	August 1, 2017	June 15, 2027
LaSalle County Stations, Units 1 and 2	Fourth	2007 Edition, through 2008 Addenda	October 1, 2017	September 30, 2027
Limerick Generating Station, Units 1 and 2	Fourth	2007 Edition, through 2008 Addenda	February 1, 2017	January 31, 2027
Nine Mile Point Nuclear Station, Unit 1	Fifth	2013 Edition	August 23, 2019	August 22, 2029
Nine Mile Point Nuclear Station, Unit 2	Fourth	2013 Edition	October 6, 2018	August 22, 2028
Peach Bottom Atomic Power Station, Units 2 and 3	Fifth	2013 Edition	January 1, 2019	December 31, 2028

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<u>PLANT</u>	<u>INTERVAL</u>	<u>EDITION</u>	<u>START</u>	<u>END</u>
Quad Cities Nuclear Power Station, Units 1 and 2	Fifth	2007 Edition, through 2008 Addenda	April 2, 2013	April 1, 2023
R. E. Ginna Nuclear Power Plant	Fifth	2004 Edition	January 1, 2010	December 31, 2019
R. E. Ginna Nuclear Power Plant	Sixth	2013 Edition	January 1, 2020	December 31, 2029
Three Mile Island Nuclear Station, Unit 1	Fourth	2004 Edition	April 20, 2011	April 19, 2022