



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

April 30, 2020

Mr. Bryan C. Hanson  
Senior Vice President  
Exelon Generation Company, LLC  
President and Chief Nuclear Officer (CNO)  
Exelon Nuclear  
4300 Winfield Road  
Warrenville, IL 60555

SUBJECT: BRAIDWOOD STATION, UNIT 2; BYRON STATION, UNIT NO. 1; CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT 1; LASALLE COUNTY STATION, UNIT 1; LIMERICK GENERATING STATION, UNIT 1; NINE MILE POINT NUCLEAR STATION, UNIT 2; QUAD CITIES NUCLEAR POWER STATION, UNIT 2; AND R. E. GINNA NUCLEAR POWER PLANT — PROPOSED ALTERNATIVE TO THE SUBMITTAL SCHEDULE FOR CERTAIN REPORTS [COVID-19] (EPID L-2020-LLR-0066)

Dear Mr. Hanson:

By application dated April 17, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20108F528), Exelon Generation Company, LLC (Exelon) submitted a request for a proposed alternative to the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a, "Codes and standards," and the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) for the eight reactors in its fleet that have Spring 2020 refueling outages. Specifically, the proposed alternative would allow Exelon to defer preparation and submittal of the inservice inspection (ISI) summary report or the Owner's Activity Report (Form OAR-1) for the Spring 2020 refueling outages at Braidwood Station, Unit 2; Byron Station, Unit No. 1; Calvert Cliffs Nuclear Power Plant, Unit 1; LaSalle County Station, Unit 1; Limerick Generating Station, Unit 1; Nine Mile Point Nuclear Station, Unit 2; Quad Cities Nuclear Power Station, Unit 2; and R. E. Ginna Nuclear Power Plant.

In response to the current public health emergency, Exelon has implemented measures recommended by the Centers for Disease Control and Prevention to limit the spread of Coronavirus Disease 2019 (COVID-19). These measures include social distancing, worker screening, and limiting close-proximity work. Exelon employees are telecommuting as their duties allow as one means of implementing these measures. Currently, Exelon is required to prepare and submit either the ISI summary report or Form OAR-1 to the U.S. Nuclear Regulatory Commission (NRC) within 90 days of the completion of each refueling outage. Exelon stated that meeting this requirement for plants with Spring 2020 refueling outages would affect its ability to maintain telecommuting for individuals involved in the preparation of these reports. Therefore, Exelon requested to use the proposed alternative on the basis that preparation and submittal of these reports on the currently required schedule is a hardship without a compensating increase in the level of quality and safety in accordance with 10 CFR 50.55a(z)(2).

Exelon requested use of an expedited review process described in a letter from Mr. Ho Nieh to the Nuclear Energy Institute dated April 9, 2020 (ADAMS Accession No. ML20098D975). However, the alternative Exelon requested is different than the alternative described in that letter and therefore was not reviewed using the expedited process.

The NRC staff has reviewed the subject request and concludes, as set forth in the enclosed safety evaluation, that compliance with the requirements to prepare and submit either an ISI summary report or Form OAR-1 to the NRC within 90 days of the completion of the Spring 2020 refueling outages at the subject facilities would result in a hardship without a compensating increase in the level of quality and safety. Accordingly, the NRC staff concludes that Exelon has adequately addressed the regulatory requirements set forth in 10 CFR 50.55a(z)(2). Therefore, the NRC staff authorizes Exelon to use the proposed alternative described in its application at Braidwood Station, Unit 2; Byron Station, Unit No. 1; Calvert Cliffs Nuclear Power Plant, Unit 1; LaSalle County Station, Unit 1; Limerick Generating Station, Unit 1; Nine Mile Point Nuclear Station, Unit 2; Quad Cities Nuclear Power Station, Unit 2; and R. E. Ginna Nuclear Power Plant.

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

If you have any questions, please contact Blake Purnell at 301-415-1380 or via e-mail at [Blake.Purnell@nrc.gov](mailto:Blake.Purnell@nrc.gov).

Sincerely,

Nancy L. Salgado, Chief  
Plant Licensing Branch III  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-457, STN 50-454,  
50-317, 50-373, 50-352, 50-410, 50-265,  
and 50-244

Enclosure:  
Safety Evaluation

cc: ListServ



UNITED STATES  
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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
PROPOSED ALTERNATIVE TO THE SUBMITTAL SCHEDULE FOR CERTAIN REPORTS

BRAIDWOOD STATION, UNIT 2

BYRON STATION, UNIT NO. 1

CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT 1

LASALLE COUNTY STATION, UNIT 1

LIMERICK GENERATING STATION, UNIT 1

NINE MILE POINT NUCLEAR STATION, UNIT 2

QUAD CITIES NUCLEAR POWER STATION, UNIT 2

AND R. E. GINNA NUCLEAR POWER PLANT

EXELON GENERATION COMPANY, LLC

DOCKET NOS. STN 50-457, STN 50 454, 50 317, 50 373,

50 352, 50 410, 50-265, AND 50-244

1.0 INTRODUCTION

By application dated April 17, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20108F528), Exelon Generation Company, LLC (Exelon) submitted a request for a proposed alternative to the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a, "Codes and standards," and the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) for the eight reactors in its fleet that have Spring 2020 refueling outages. Specifically, the proposed alternative would allow Exelon to defer preparation and submittal of the inservice inspection (ISI) summary report or the Owner's Activity Report (Form OAR-1) for the Spring 2020 refueling outages at Braidwood Station (Braidwood), Unit 2; Byron Station (Byron), Unit No. 1; Calvert Cliffs Nuclear Power Plant (Calvert Cliffs), Unit 1; LaSalle County Station (LaSalle), Unit 1; Limerick Generating Station (Limerick), Unit 1; Nine Mile Point Nuclear Station (Nine Mile Point), Unit 2; Quad Cities Nuclear Power Station (Quad Cities), Unit 2; and R. E. Ginna Nuclear Power Plant (Ginna) (collectively, the facilities). Exelon requested to use the alternative on the basis that preparation and submittal of the ISI summary report or Form OAR-1 (also referred to as the reports below) on the currently required schedule is a hardship without a compensating increase in the level of quality and safety in accordance with 10 CFR 50.55a(z)(2).

Enclosure

On January 31, 2020, the U.S. Department of Health and Human Services declared a public health emergency (PHE) for the United States to aid the nation's healthcare community in responding to the Coronavirus Disease 2019 (COVID-19).

## 2.0 REGULATORY EVALUATION

### 2.1 Regulatory Requirements

The regulations in 10 CFR 50.55a include, in part, requirements for the use of the ASME Code for the design, construction and ISI of nuclear power plants. Specific editions and addenda, or portions thereof, of Section XI of the ASME Code have been incorporated by reference into 10 CFR 50.55a(a)(1)(ii), including the 2004 Edition, 2007 Edition, 2008 Addenda, and 2013 Edition of Section XI currently in use at the subject facilities. The editions and addenda of the ASME Code, Section XI, are subject to the limitations in 10 CFR 50.55a(b)(2).

The NRC Regulatory Guide (RG) 1.147, Revision 19, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1," dated October 2019 (ADAMS Accession No. ML19128A244), is incorporated by reference into 10 CFR 50.55a(3)(ii). RG 1.147 identifies ASME Code Cases that the NRC has approved for use as voluntary alternative to the mandatory ASME Code, Section XI, provisions that are incorporated by reference into 10 CFR 50.55a. Licensees are permitted to use the Code Cases listed in RG 1.147 without prior NRC approval provided they meet the conditions of 10 CFR 50.55a(b)(5).

The regulations in 10 CFR 50.55a(g)(4) state, in part, that ASME Code Class 1, 2, and 3 components (including supports) must meet the requirements, except the design and access provisions and the preservice examination requirements, set forth in Section XI of the applicable editions and addenda of the ASME Code to the extent practical within the limitations of design, geometry, and materials of construction of the components. ASME Code Class MC and CC pressure retaining components and their integral attachments must meet the requirements, except the design and access provisions and the preservice examination requirements, set forth in Section XI of the applicable editions and addenda of the ASME Code, subject to the conditions listed in paragraphs (vi), (viii), and (ix) of 10 CFR 50.55a(b)(2), to the extent practical within the limitations of design, geometry, and materials of construction of the components.

Paragraph 10 CFR 50.55a(g)(4)(ii) requires, in part, that inservice examination of components and system pressure tests conducted during successive 10-year ISI intervals (i.e., after the initial 10-year interval) must comply with the latest edition and addenda of the ASME Code (or the optional ASME Code Cases) incorporated by reference in 10 CFR 50.55a(a) 12 months before the start of the 10-year interval subject to the conditions listed in 10 CFR 50.55a(b). The 2007 Edition and 2008 Addenda of Section XI of the ASME Code are applicable to the current 10-year ISI intervals at Exelon's facilities.

Paragraph (b)(2)(xxxii) of 10 CFR 50.55a states, in part, that when using the 2010 or later editions and addenda of the ASME Code, Section XI, the ISI summary reports shall be submitted to the NRC within 90 days of the completion of each refueling outage.

The regulations in 10 CFR 50.55a(z) state, in part, that alternatives to the requirements in paragraphs (b) through (h) of 10 CFR 50.55a may be authorized by the NRC if the licensee demonstrates that: (1) the proposed alternative provides an acceptable level of quality and safety, or (2) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

## 2.2 ASME Code Requirements

Subarticle IWA-1400 of the ASME Code, Section XI, describes the responsibilities of the owner of the nuclear power plant. These responsibilities include preparation and submittal of ISI summary reports to the NRC.

In general, Article IWA-6000, "Records and Reports," of the ASME Code, Section XI, provides the requirements for the preparation, submittal, and retention of records and reports. Paragraph IWA-6230, "Summary Report Preparation," specifies, in part, the requirements of the ISI summary report. The ISI summary report must be prepared following each refueling outage and shall contain completed Forms NIS-1 and NIS-2 provided in Mandatory Appendix II to Section XI.

For licensees with the 2004 Edition or 2007 Edition (through the 2008 Addenda) of the ASME Code, Section XI, as the code of record, subparagraph IWA-6240(b) requires the ISI summary report to be submitted to the NRC within 90 days of the completion of each refueling outage.

For licensees with the 2013 Edition of the ASME Code, Section XI, as the code of record, 10 CFR 50.55a(b)(2)(xxxii) requires the ISI summary report to be submitted to the NRC as described in Section XI, subparagraph IWA-6240(b), within 90 days of the completion of each refueling outage. Subparagraph IWA-6240(b) requires the ISI summary report to be completed within 90 days of the completion of each refueling outage.

Licensees may also use the ASME Code Case N-532-5 as an alternative to the ASME Code requirements in Section XI (including other Code Cases) for completing the ISI summary report and Forms NIS-1 and NIS-2. Code Case N-532-5 is the latest version of this code case approved by the NRC for general use by licensees in RG 1.147, Revision 19. Code Case N-532-2 requires, in part, that Form OAR-1 be processed within 90 days of the completion of each refueling outage. Processing includes submittal of the completed Form OAR-1 to the NRC.

In summary, licensees are currently required to prepare and submit either the ISI summary report or Form OAR-1 to the NRC within 90 days of the completion of each refueling outage.

## 3.0 TECHNICAL EVALUATION

### 3.1 Exelon's Request

#### 3.1.1 Applicable Code Edition and Addenda

The licensee identified the applicable ASME Code editions and addenda for each facility in its application as shown in the table below. In addition, the table shows the current due date for submittal of either the ISI summary report or Form OAR-1 for each unit except Ginna and Braidwood, Unit 2. As of the date of the application, the Spring 2020 refueling outages at Ginna and Braidwood, Unit 2, had not been completed.

<b>PLANT</b>	<b>ASME CODE EDITION</b>	<b>Current Report Due Date</b>
LaSalle, Unit 1	2007 Edition, through 2008 Addenda	May 28, 2020
Calvert Cliffs, Unit 1	2013 Edition	June 10, 2020

<b>PLANT</b>	<b>ASME CODE EDITION</b>	<b>Current Report Due Date</b>
Byron, Unit 1	2007 Edition, through 2008 Addenda	June 25, 2020
Nine Mile Point, Unit 2	2013 Edition	July 2, 2020
Limerick, Unit 1	2007 Edition, through 2008 Addenda	July 12, 2020
Quad Cities, Unit 2	2007 Edition, through 2008 Addenda, and 2013 Edition	July 14, 2020
Ginna	2004 and 2013 Editions	90 days after the end of the Spring 2020 refueling outage
Braidwood, Unit 2	2013 Edition	90 days after the end of the Spring 2020 refueling outage

### 3.1.2 Proposed Alternative

In lieu of the requirements to prepare and submit the ISI summary report or Form OAR-1 within 90 days following the completion of the Spring 2020 refueling outages at its facilities, Exelon proposes an alternative schedule for submitting these reports to the NRC. Exelon proposes to submit the LaSalle, Unit 1, ISI summary report or Form OAR-1 no later than 90 days following the end of the PHE. Exelon will submit each subsequent remaining site ISI summary report or Form OAR-1 in approximately 30-day intervals, in order of their respective due dates, up to 300 days following the end of the PHE, but in no case later than the beginning of the subsequent refueling outage.

The proposed alternative only relates to the schedule for preparing and submitting the ISI summary report or Form OAR-1 to the NRC. The information required to be included in these reports is not changed by the proposed alternative.

### 3.1.4 Exelon's Bases for the Proposed Alternative

In response to the COVID-19 PHE, Exelon has implemented measures recommended by the Centers for Disease Control and Prevention (CDC) to limit the spread of COVID-19. These measures include social distancing, worker screening, and limiting close-proximity work. Exelon employees are telecommuting as their duties allow as one means of implementing these measures. Currently, Exelon is required to prepare and submit either the ISI summary report or Form OAR-1 to the NRC within 90 days of the completion of each refueling outage. Exelon stated that meeting this requirement for plants with Spring 2020 refueling outages would affect its ability to maintain telecommuting for individuals involved in the preparation of these reports. Therefore, Exelon determined that compliance with these requirements would result in a hardship or unusual difficulty without a compensating increase in the level of quality and safety.

The application states, in part:

This staggered submittal of the reports will reduce the hardship created by the sudden lifting of the PHE that will result in an immediate demand of site engineering, maintenance, Authorized Nuclear Inservice Inspector (ANII) services, and centralized engineering resources that are necessary to prepare this administrative report. If all eight stations were required to submit their reports within 90 days following the end of the PHE, it would divert plant and centralized engineering personnel resources. Following the end of the PHE, it is

expected that when personnel return to their sites, preparation of the report will be complicated with the additional normal workload that has been delayed as a result of the pandemic.

The bulk of the effort to prepare the report is associated with work order close out and review. Each work order associated with ASME Section XI work for the previous operating cycle needs to be completed, closed, reviewed, and archived by maintenance and clerical personnel. Depending on the amount of inservice activities that occur during the previous operating cycle, the report requires a range of 400 to 650 person-hours to prepare. Site programs personnel, centralized engineering, and the ANII are constantly reviewing the work along the way to ensure code compliance.

### 3.2 NRC Staff's Evaluation

In lieu of the requirements to prepare and submit the ISI summary report or Form OAR-1 within 90 days following the completion of the Spring 2020 refueling outages at its facilities, Exelon proposes an alternative schedule for submitting these reports to the NRC. Specifically, Exelon proposed to submit the reports for its facilities with Spring 2020 refueling outages approximately every 30 days, with the first report submitted within 90 days after the PHE has ended and the last report submitted within 300 days after the PHE has ended. However, Exelon also stated that all reports would be submitted by the beginning of the subsequent refueling outage.

The NRC staff determined that preparation of the ISI summary report or Form OAR-1 during the PHE is a hardship because it would reduce Exelon's ability to implement the measures recommended by the CDC to limit the spread of COVID-19. This hardship justifies changing the reference date for the reporting requirements from the date the Spring 2020 refueling outage is completed to the date the PHE ends.

Currently, each report must be submitted to the NRC within 90 days following the completion of each refueling outage. Under normal circumstances, Exelon would have approximately 6 months to prepare and submit the eight reports for its plants with Spring 2020 refueling outages since the outages do not all occur at the same time. Due to measures implemented in response to the COVID-19 PHE, Exelon has deferred certain activities including preparation of these reports. When the PHE ends, Exelon anticipates that "preparation of the report will be complicated with the additional normal workload that has been delayed as a result of the pandemic." Preparation of each report requires support from site engineering, maintenance, ANII services, and centralized engineering resources and requires 400 to 650 person-hours to prepare. Based on this information, the NRC staff determined that preparation of each report within a 90-day period following the end of the PHE is a hardship.

Exelon proposes to submit the reports approximately every 30 days, with the first report submitted within 90 days after the PHE has ended and the last report submitted within 300 days after the PHE has ended. However, Exelon also stated that all reports will be submitted by the beginning of the subsequent refueling outage. In addition, Exelon stated that it has established procedures to retain records of its completed inspection items that are easily accessible for NRC inspection. Thus, the NRC staff will be able to inspect and address items that would normally be included in the reports. Therefore, the NRC staff concludes that submittal of the reports on the currently required schedule would not increase the level of quality and safety compared to the proposed schedule that would compensate for the hardship Exelon has identified.

#### 4.0 CONCLUSION

As set forth above, the NRC staff determined that compliance with the requirements to prepare and submit either an ISI summary report or Form OAR-1 to the NRC within 90 days of the completion of the Spring 2020 refueling outages at Exelon's facilities would result in a hardship without a compensating increase in the level of quality and safety. Accordingly, the NRC staff concludes that Exelon has adequately addressed the regulatory requirements set forth in 10 CFR 50.55a(z)(2). Therefore, the NRC staff authorizes Exelon to use the proposed alternative described in its application at Braidwood, Unit 2; Byron, Unit No. 1; Calvert Cliffs, Unit 1; LaSalle, Unit 1; Limerick, Unit 1; Nine Mile Point, Unit 2; Quad Cities, Unit 2; and Ginna. For each unit, this authorization remains in effect from the date of this letter until the start of the next refueling outage after the Spring 2020 refueling outage.

All other ASME Code requirements for which relief was not been specifically requested and approved remain applicable, including third-party review by the ANII.

Principal Contributor: B. Purnell, NRR

Date of issuance: April 30, 2020

SUBJECT: BRAIDWOOD STATION, UNIT 2; BYRON STATION, UNIT NO. 1; CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT 1; LASALLE COUNTY STATION, UNIT 1; LIMERICK GENERATING STATION, UNIT 1; NINE MILE POINT NUCLEAR STATION, UNIT 2; QUAD CITIES NUCLEAR POWER STATION, UNIT 2; AND R. E. GINNA NUCLEAR POWER PLANT — PROPOSED ALTERNATIVE TO THE SUBMITTAL SCHEDULE FOR CERTAIN REPORTS (EPID L-2020-LLR-0066) DATED APRIL 30, 2020

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