



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

June 2, 2020

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

SUBJECT: NINE MILE POINT NUCLEAR STATION, UNIT 2 - RELIEF FROM THE
REQUIREMENTS OF THE AMERICAN SOCIETY OF MECHANICAL
ENGINEERS BOILER AND PRESSURE VESSEL CODE
(EPID-L-2019-LLR-0099)

Dear Mr. Hanson:

By letter dated September 24, 2019 (Agencywide Documents Access and Management System Accession No. ML19267A024), Exelon Generation Company, LLC (the licensee) submitted Relief Request 2ISI-014 to the U.S. Nuclear Regulatory Commission (NRC) requesting relief from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPV Code), Section XI, for the third 10-year inservice inspection interval at Nine Mile Point Nuclear Station (Nine Mile Point), Unit 2.

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(g)(6)(i), the licensee requested relief for inservice inspection items on the basis that the ASME BPV Code requirement is impractical.

The NRC staff has reviewed the subject request and concludes, as set forth in the enclosed safety evaluation, that it has the regulatory authority to grant the requested relief and that complying with the specified ASME BPV Code requirements would be impractical. The NRC staff concludes that the licensee has adequately addressed all the regulatory requirements set forth in 10 CFR 50.55a(g)(5)(iii). Therefore, in accordance with 10 CFR 50.55a(g)(6)(i), the NRC staff grants Relief Request 2ISI-014 for Nine Mile Point, Unit 2, for the third 10-year inservice inspection interval, which began on October 6, 2008, and ended on October 5, 2018.

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

B. Hanson

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If you have any questions, please contact the Nine Mile Point Project Manager, Michael Marshall, at (301) 415-2871 or Michael.Marshall@nrc.gov.

Sincerely,

James G. Danna, Chief
Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-410

Enclosure:
Safety Evaluation

cc: Listserv



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO RELIEF REQUEST 2ISI-014

NINE MILE POINT NUCLEAR STATION, LLC

LONG ISLAND LIGHTING COMPANY

EXELON GENERATION COMPANY, LLC

NINE MILE POINT NUCLEAR STATION, UNIT 2

DOCKET NO. 50-410

1.0 INTRODUCTION

By letter dated September 24, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19267A024), Exelon Generation Company, LLC (the licensee) submitted Relief Request (RR) 2ISI-014 to the U.S. Nuclear Regulatory Commission (NRC) requesting relief from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPV Code) for the third 10-year inservice inspection (ISI) interval of Nine Mile Point Nuclear Station, Unit 2 (Nine Mile Point 2).

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(g)(5)(iii), the licensee requested relief from Section XI of the ASME BPV Code for Class 1 and 2 components. The licensee asserts that compliance with the specified ASME BPV Code requirement is impractical.

2.0 LICENSEE'S PROPOSED RELIEF REQUEST

2.1 Examination Category B-O, "Pressure-Retaining Welds in Control Rod Drive and Instrument Nozzle Housings"

2.1.1 Components for Which the Relief is Requested

The components for which relief is requested are listed in the following table.

Table 1. Examination Category B-O Limited Examination Coverage				
Item No.	Weld Identification	Weld Material; Component Description	Examination Limitation	Percent Coverage Achieved
B14.10	2RPV-CRDH001A	Austenitic ss; Pipe-to-flange weld	Obstructions caused by adjoining components	43
B14.10	2RPV-CRDH001B	Austenitic ss; Pipe-to-pipe weld	Obstructions caused by adjoining components	80
B14.10	2RPV-CRDH004A	Austenitic ss; Pipe-to-flange weld	Obstructions caused by adjoining components	43
B14.10	2RPV-CRDH004B	Austenitic ss; Pipe-to-pipe weld	Obstructions caused by adjoining components	75
B14.10	2RPV-CRDH005A	Austenitic ss; Pipe-to-flange weld	Obstructions caused by adjoining components	63.8
B14.10	2RPV-CRDH005B	Austenitic ss; Pipe-to-pipe weld	Obstructions caused by adjoining components	63.8
B14.10	2RPV-CRDH038A	Austenitic ss; Pipe-to-flange weld	Obstructions caused by adjoining components	85.1
B14.10	2RPV-CRDH038B	Austenitic ss; Pipe-to-pipe weld	Obstructions caused by adjoining components	74.4

2.1.2 Code Edition and Addenda of Record

The Code of record at Nine Mile Point 2 for the third 10-year ISI interval is the 2004 Edition of the ASME Code, Section XI.

2.1.3 Applicable Code Requirements

The ASME Code examination requirement is surface or volumetric examinations of essentially 100 percent of the applicable weld surface or volume defined in Figure IWB-2500-18, "Control Rod Drive and Instrument Nozzle Housing Welds," of the ASME Code, Section XI. When 100 percent of the required surface or volume cannot be examined due to interferences, obstructions, or geometrical configuration, ASME Code Case N-460, "Alternative Examination Coverage for Class 1 and Class 2 Welds," allows reduction of the examination surface or volume to 90 percent of the required surface or volume. Code Case N-460 has been approved for use without conditions by the NRC in Regulatory Guide 1.147, Revision 18, "Inservice

Inspection Code Case Acceptability, ASME Section XI, Division 1” (ADAMS Accession No. ML16321A336), which is incorporated by reference in 10 CFR 50.55a(a)(3)(ii).

2.1.4 Reason for Request

The licensee achieved the coverage shown in Table 1 of this safety evaluation (SE) for the subject welds but could not achieve the ASME Code-required examination coverage because of the examination limitation listed for each weld. For the eight welds in Table 1, the licensee achieved between 43.0 percent and 85.1 percent of the required examination coverage and did not detect any recordable indications. The licensee stated that due to these limitations, complying with the ASME Code-required examination coverage is impractical, and thus, is requesting relief pursuant to 10 CFR 50.55a(g)(5)(iii).

The licensee stated that the required examination coverage can only be accomplished by modifying or disassembling components associated with the welds beyond their current design, which presents a burden of compliance. In lieu of the ASME Code-required examination coverage, the licensee examined the welds to the maximum extent practical, achieving the coverage in Table 1 by liquid penetrant testing examination.

2.1.5 Duration of the Relief

The licensee submitted RR 2ISI-014 for the third 10-year ISI interval at Nine Mile Point 2, which began on October 6, 2008, and ended on October 5, 2018.

2.2 Examination Category B-A, “Pressure-Retaining Welds in Reactor Vessel”

2.2.1 Component for Which the Relief is Requested

The component for which relief is requested is listed in the following table.

Table 2. Examination Category B-A Limited Volumetric Examination Coverage				
Item No.	Weld Identification	Weld Material; Component Description	Examination Limitation	Percent Coverage Achieved
B1.40	2RPV-AG	Ferritic steel; Head-to-flange weld	Obstructions caused by weld configuration	80.25

2.2.2 Code Edition and Addenda of Record

The Code of record at Nine Mile Point 2 for the third 10-year ISI interval is the 2004 Edition of the ASME Code, Section XI.

2.2.3 Applicable Code Requirements

The ASME Code examination requirement is surface and volumetric examinations of essentially 100 percent of the applicable weld surface and volume defined in Item No. B1.40, Category B-A of IWB-2500-1, “Examination Category B-A, Pressure-Retaining Welds in Reactor Vessel,” of the ASME Code, Section XI. When 100 percent of the required surface or volume cannot be examined due to interferences, obstructions, or geometrical configuration, Code Case N-460,

“Alternative Examination Coverage for Class 1 and Class 2 Welds,” allows reduction of the examination volume to 90 percent of the required surface or volume. Code Case N-460 has been approved for use without conditions by the NRC in Regulatory Guide 1.147, Revision 18, which is incorporated by reference in 10 CFR 50.55a(a)(3)(ii).

2.2.4 Reason for Request

The licensee achieved the coverage shown in Table 2 of this SE for the subject weld but could not achieve the ASME Code-required volumetric examination coverage because of the examination limitation listed for the weld. For the weld in Table 2, the licensee achieved 80.25 percent of the required volumetric examination coverage and essentially 100 percent of the required surface examination coverage and did not detect any recordable indications. The licensee stated that due to these limitations, complying with the ASME Code-required volumetric examination coverage is impractical, and thus, is requesting relief pursuant to 10 CFR 50.55a(g)(5)(iii).

The licensee stated that the required examination coverage can only be accomplished by modifying the design of the closure head-to-flange weld configuration, which presents a burden of compliance. In lieu of the ASME Code-required examination coverage, the licensee examined the weld to the maximum extent practical, achieving the coverage in Table 2 by ultrasonic testing (UT) examination. In addition, the licensee examined essentially 100 percent of the required surface examination coverage by using penetrant testing examination.

2.2.5 Duration of the Relief

The licensee submitted RR 2ISI-014 for the third 10-year ISI interval at Nine Mile Point 2, which began on October 6, 2008, and ended on October 5, 2018.

2.3 Examination Category R-A, “Risk-Informed Inservice Inspection Program Welds, Item Nos. R1.11, R1.16, and R1.20

2.3.1 Components for Which the Relief is Requested

The components for which relief is requested are listed in the following table.

Table 3. Examination Category R-A Limited Volumetric Examination Coverage				
Item No.	Weld Identification	Weld Material; Component Description	Examination Limitation	Percent Coverage Achieved
R1.16	2WCS-09-05-FW014	Austenitic ss; Sweep-o-let-to-pipe	Obstructions caused by weld configuration	50
R1.16	2WCS-09-05-FW015	Austenitic ss; Sweep-o-let-to-pipe	Obstructions caused by weld configuration	50
R1.11	2SLS-88A-FW042A	Austenitic ss; Pipe-to-weld-O-let	Obstructions caused by weld configuration	73
R1.11	2ISC-322B-SW005	Austenitic ss; Tee-to-reducer	Obstructions caused by component geometry	85.5

Table 3. Examination Category R-A Limited Volumetric Examination Coverage				
Item No.	Weld Identification	Weld Material; Component Description	Examination Limitation	Percent Coverage Achieved
R1.11	2SLS-88A-FW013A	Austenitic ss; Valve-to-reducer	Obstructions caused by weld configuration	50
R1.11	2SLS-88A-FW015	Austenitic ss; Pipe-to-tee	Obstructions caused by weld configuration	89
R1.11	2WCS-09-05-SW024	Austenitic ss; Tee-to-pipe	Obstructions caused by weld configuration	89.79
R1.11, R1.16	2WCS-09-05-SW025	Austenitic ss; Pipe-to-flange	Obstructions caused by weld configuration	75
R1.11, R1.16	2WCS-09-05-SW032	Austenitic ss; Tee-to-pipe	Obstructions caused by weld configuration	89.79
R1.11, R1.16	2WCS-09-05-SW033	Austenitic ss; Pipe-to-flange	Obstructions caused by weld configuration	50
R1.11, R1.16	2RCS-64-00-FWA07	Austenitic ss; Pipe-to-valve	Obstructions caused by weld configuration	50
R1.11, R1.16	2RPV-KC23	Ferritic steel; Safe end-to-safe end extension	Obstructions caused by weld configuration	80.3
R1.16	2RPV-KC32	Ferritic steel; Safe end-to-safe end extension	Obstructions caused by weld configuration	81.6
R1.20	2DER-07A-FW002	Ferritic steel; Pipe-to-valve	Obstructions caused by weld configuration	33

2.3.2 Code Edition and Addenda of Record

The Code of record at Nine Mile Point 2 for the third 10-year ISI interval is the 2004 Edition of the ASME Code, Section XI.

2.3.3 Applicable Code Requirements

The examination requirement for the R-A category welds is volumetric examination of essentially 100 percent of the applicable volume defined in Figure IWB-2500-8(c), "Similar and Dissimilar Metal Welds in Components, Nozzles, and Piping," of the ASME Code, Section XI, except that the length of the examination volume shall be increased to include 1/2 inch beyond each side of the metal thickness transition or counterbore.

2.3.4 Reason for Request

The licensee achieved the volumetric coverage shown in Table 3 of this SE for the subject welds but could not achieve the ASME Code-required examination coverage because of the examination limitations shown. For the 14 welds in Table 3, the licensee achieved between 33 percent and 89.79 percent of the required examination volume and did not detect any recordable indications. The licensee stated that due to physical limitations, complying with the ASME Code-required examination coverage is impractical, and thus, is requesting relief pursuant to 10 CFR 50.55a(g)(5)(iii).

The licensee indicated that the required examination coverage can only be accomplished by modifying and/or disassembling components associated with the reduced examination coverage beyond their current configuration, which presents a burden of compliance. In lieu of the ASME Code-required examination coverage, the licensee examined these welds to the maximum extent practical and achieved the coverage listed in Table 3. The volumetric examinations were performed in accordance with Section XI, Mandatory Appendix I, I-2220, which implements the Appendix VIII Performance Demonstration Program for ultrasonic examinations.

2.3.5 Duration of the Relief

The licensee submitted RR 2ISI-014 for the third 10-year ISI interval at Nine Mile Point 2, which began on October 6, 2008, and ended on October 5, 2018.

2.4 Examination Category C-A, "Pressure-Retaining Welds in Pressure Vessels, Item No. C1.10, Shell Circumferential Welds

2.4.1 Component for Which the Relief is Requested

The components for which relief is requested are listed in the following table.

Item No.	Weld Identification	Weld Material; Component Description	Examination Limitation	Percent Coverage Achieved
C1.10	2RHS-E1A-HW101A	Ferritic steel; Flange-to-shell	Obstructions caused by weld configuration and adjacent weld configuration	83.8

2.4.2 Code Edition and Addenda of Record

The Code of record at Nine Mile Point 2 for the third 10-year ISI interval is the 2004 Edition of the ASME Code, Section XI.

2.4.3 Applicable Code Requirements

The examination requirement is volumetric examination of essentially 100 percent of the applicable volume defined in Figure IWC-2500-1, "Vessel Circumferential Welds," of the ASME Code, Section XI. When 100 percent of the required volume or area cannot be examined due to interferences, obstructions, or geometrical configuration, Code Case N-460 allows reduction of the examination volume to 90 percent of the required volume.

2.4.4 Reason for Request

The licensee achieved the coverage shown in Table 4 of this SE for the subject weld and could not achieve the ASME Code-required examination coverage because of the examination limitation listed for the weld. For this weld, the licensee achieved 83.8 percent of the required examination volume and did not detect any recordable indications. The licensee stated that due to these limitations, complying with the ASME Code-required examination coverage is impractical and is, therefore, requesting relief pursuant to 10 CFR 50.55a(g)(5)(iii).

The licensee stated that the required examination coverage can only be accomplished by modifying or disassembling components associated with the weld beyond their current design, which presents a burden of compliance. In lieu of the ASME Code-required examination coverage, the licensee examined the weld to the maximum extent practical, achieving the coverage by UT examination in accordance with Article 4 of Section V of the ASME Code (for thicknesses greater than 2 inches) and Appendix III (for thicknesses not greater than 2 inches) of Section XI of the ASME Code.

2.4.5 Duration of the Relief

The licensee submitted RR 2ISI-014 for the third 10-year ISI interval at Nine Mile Point 2, which began on October 6, 2008, and ended on October 5, 2018.

3.0 REGULATORY EVALUATION

The regulations in 10 CFR 50.55a(g)(4) require that, throughout the service life of a boiling or pressurized water-cooled nuclear power facility, components classified as ASME Code Class 1, 2, and 3 components meet the requirements, except the design and access provisions and preservice examination requirements, set forth in Section XI of the ASME Code incorporated by reference in 10 CFR 50.55a(a)(1)(ii) 12 months prior to the start of the 120-month inspection interval, subject to the conditions listed in 10 CFR 50.55a(b)(2).

The licensee is requesting relief from the ASME BPV Code, Section XI, in accordance with 10 CFR 50.55a(g)(5)(iii). The regulations in 10 CFR 50.55a(g)(5)(iii) state, in part, that:

If the licensee has determined that conformance with a Code requirement is impractical for its facility the licensee must notify the [U.S. Nuclear Regulatory Commission] and submit, as specified in §50.4, information to support the determinations. Determinations of impracticality in accordance with this section must be based on the demonstrated limitations experienced when attempting to

comply with the Code requirements during the inservice inspection interval for which the request is being submitted.

The NRC staff may grant relief from ASME BPV Code requirements as provided in 10 CFR 50.55a(g)(6)(i), which states that:

The Commission will evaluate determinations under paragraph (g)(5) of this section that code requirements are impractical. The Commission may grant such relief and may impose such alternative requirements as it determines are authorized by law, will not endanger life or property or the common defense and security, and are otherwise in the public interest giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility.

The NRC staff finds that, subject to the following technical evaluation, the licensee may request relief from the ASME BPV Code, Section XI, and the NRC staff has the regulatory authority to grant the relief.

4.0 NRC TECHNICAL EVALUATION

4.1 Examination Category B-O, "Pressure-Retaining Welds in Control Rod Drive and Instrument Nozzle Housings"

For the pressure-retaining control rod drive and instrument nozzle housing welds in Table 1 of this SE, the licensee achieved less than 90 percent of the required examination coverage due to geometric limitations that would entail modification of the associated components if the required coverage were to be obtained. The staff noted that the Code-required examination coverage is limited due to geometry of the welds. In order to achieve Code-required coverage, these welds would have to be redesigned, which is impractical. The staff finds the stated limitations to be an acceptable basis for impracticality of conforming to the requirements and finds the modification necessary to achieve the required coverage constitutes a burden upon the licensee.

The licensee examined the pressure-retaining welds in Table 1 of this SE to the maximum extent practical using penetrant testing examination and achieved the coverage as shown in the table. The staff reviewed the examination coverage sheets provided in Attachment 2, "Limited Coverage Non-Destructive Examination Reports," of the submittal and verified the licensee's achieved coverage. The staff finds the licensee's achieved coverage acceptable. The examined coverage included weld surfaces where degradation is expected to show, should it occur.

Based on the above discussion, the staff determined that obtaining the ASME Code-required examination coverage for the subject pressure-retaining control rod drive and instrument nozzle housing welds is impractical because of the stated limitations and that the modification necessary to obtain the required coverage would impose a burden upon the licensee. The staff also determined that the surface examination performed to the maximum extent practical provides reasonable assurance of structural integrity of the welds because: (1) the licensee identified no recordable indications; and (2) evidence of service-induced degradation in the welds, if it were to occur, would likely be detected in the examination coverage already obtained by the licensee, because the examined weld surface includes the susceptible regions, is the same material as the unexamined surface, is under similar stress loading conditions, and is exposed to the same reactor coolant environment.

4.2 Examination Category B-A, "Pressure-Retaining Welds in Reactor Vessel"

For the pressure-retaining weld in Table 2 of this SE, the licensee achieved less than 90 percent of the required examination coverage due to geometric limitations that would entail modification of the associated components if the required coverage were to be obtained. The staff finds the stated limitations to be an acceptable basis for impracticality of conforming to the requirements and finds the modification necessary to achieve the required coverage constitutes a burden upon the licensee.

The licensee examined the pressure-retaining weld to the maximum extent practical using UT examination and achieved 80.25 percent of coverage as shown in Table 2. The staff reviewed the corresponding examination coverage sheets provided in Attachment 2, "Limited Coverage Non-Destructive Examination Reports," of the submittal and verified the licensee's achieved coverage. The staff finds the licensee's achieved coverage acceptable. The examined coverage included weld volume where degradation is expected to show, should it occur. In addition, the licensee achieved essentially 100 percent of surface examination coverage and did not identify any recordable indications, which provides additional assurance of structural integrity of the component.

Based on the above discussion, the staff determined that obtaining the ASME Code-required examination coverage for the subject pressure-retaining weld is impractical because of the stated limitations and that the modification necessary to obtain the required coverage would impose a burden upon the licensee. The staff also determined that the examinations performed to the maximum extent practical provide reasonable assurance of structural integrity of the weld because: (1) the licensee identified no recordable indications; and (2) evidence of any service-induced degradation in the weld, if it were to occur, would likely be detected in the examination coverage already obtained by the licensee, because the examined weld volume includes the susceptible regions, is the same material as the unexamined volume, is under similar stress loading conditions, and is exposed to the same reactor coolant environment.

4.3 Examination Category R-A, "Risk-Informed Inservice Inspection Program Welds, Item Nos. R1.11, R1.16, and R1.20"

For the Examination Category R-A welds listed in Table 3 of this SE, the licensee achieved less than the required volumetric examination coverage due to geometric, material, and physical limitations that would entail modification of the associated components if the required coverage were to be obtained. The staff noted that the Code-required volumetric examination coverage is limited due to geometry of the welds. In order to achieve Code-required coverage, these welds would have to be redesigned, which is impractical. The staff finds the stated limitations to be an acceptable basis for impracticality of conforming to the requirements and finds the modification necessary to achieve the required coverage constitutes a burden upon the licensee.

The licensee examined the subject welds to the maximum extent practical using UT examination in accordance with Mandatory Appendix I, Subsubarticle I-2220 of Section XI of the ASME Code. These examinations implemented the Appendix VIII Performance Demonstration Program to achieve the UT examination coverage as shown in Table 3. The licensee was not able to achieve the required examination volume for the subject welds because of the noted limitations. The staff reviewed the examination coverage and verified the licensee's achieved coverage. The staff finds the licensee's achieved coverage acceptable, given the noted limitations. The examined volume included weld and base metal where degradation is expected to show, should it occur.

Based on the above discussion, the staff determined that obtaining the ASME Code-required examination volume coverage for the welds listed in Table 3 is impractical because of the stated limitations and that the modification necessary to obtain the required coverage would impose a burden upon the licensee. The staff also determined that the volumetric UT examination performed to the maximum extent practical provides reasonable assurance of structural integrity of the welds because: (1) the licensee identified no recordable indications; and (2) evidence of any service-induced degradation in the welds, if it were to occur, would likely have been detected by the volumetric examination coverage obtained by the licensee, because the examined weld volume includes the most susceptible regions, is the same material as the unexamined volume, is under the same loading conditions, and is exposed to the same environment.

4.4 Examination Category C-A, "Pressure -Retaining Welds in Pressure Vessels, Item No. C1.10, Shell Circumferential Welds"

For the flange-to-shell weld in Table 4 of this SE, the licensee achieved less than 90 percent of the required volumetric examination coverage due to material and geometric limitations that would entail modification and disassembly of the associated components if the required coverage were to be obtained. The staff finds the stated limitations to be an acceptable basis for impracticality of conforming to the requirements and finds the modification necessary to achieve the required coverage constitutes a burden upon the licensee.

The licensee examined this weld to the maximum extent practical using UT examination in accordance with Appendix III, Article 4, Section V of Section XI of the ASME Code, and achieved the coverage as shown in the table. The licensee used 45-degree and 70-degree shear wave scanners parallel and transverse to the weld. The staff reviewed the examination coverage sheets and verified the licensee's achieved coverage. The staff finds the licensee's achieved coverage acceptable. The examined volume included weld and base materials in the inner region where degradation is expected to show, should it occur.

Based on the above discussion, the staff determined that obtaining the ASME Code-required examination volume coverage for the subject flange-to-shell weld is impractical because of the stated limitations and that the modification necessary to obtain the required coverage would impose a burden upon the licensee. The staff also determined that the volumetric UT examination performed to the maximum extent practical provides reasonable assurance of structural integrity of the weld because: (1) the licensee identified no recordable indications; and (2) evidence of any service-induced degradation in the weld, if it were to occur, would likely be detected in the volumetric examination coverage already obtained by the licensee, because the examined weld volume includes the most susceptible regions, is the same material as the unexamined volume, is under the same loading conditions, and is exposed to the same environment.

5.0 CONCLUSION

As set forth above, the NRC staff has determined that it has the regulatory authority to grant the requested relief and complying with the specified ASME BPV Code requirements would be impractical. The NRC staff concludes that granting relief pursuant to 10 CFR 50.55a(g)(6)(i) is authorized by law, will not endanger life or property or the common defense and security, and is otherwise in the public interest, giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility. Accordingly, the NRC staff concludes that the licensee has adequately addressed all the regulatory requirements set forth in 10 CFR 50.55a(g)(5)(iii). Therefore, in accordance with 10 CFR 50.55a(g)(6)(i), the NRC

staff grants RR 2ISI-014 for Nine Mile Point 2 for the third 10-year ISI interval, which began on October 6, 2008, and ended on October 5, 2018.

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

Principal Contributor: B. Fu

Date: June 2, 2020

SUBJECT: NINE MILE POINT NUCLEAR STATION, UNIT 2 - RELIEF FROM THE REQUIREMENTS OF THE AMERICAN SOCIETY OF MECHANICAL ENGINEERS BOILER AND PRESSURE VESSEL CODE (EPID-L-2019-LLR-0099) DATED JUNE 2, 2020

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