

From: [Marshall, Michael](#)
To: [Loomis, Thomas R:\(GenCo-Nuc\)](#)
Cc: ["Mascitelli, Francis J:\(Exelon Nuclear\)"; Danna, James](#)
Subject: CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2 – REQUEST FOR ADDITIONAL INFORMATION REGARDING ALTERNATIVE REQUEST RE INSERVICE INSPECTION IMPRACTICALITY (L-2020-LLR-0089)
Date: Wednesday, September 30, 2020 9:23:00 AM

Hello Tom,

By letter dated June 18, 2020, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20170A267), Exelon Generation Company, LLC. (the licensee), submitted Relief Request (RR) ISI-04-25 to the U.S. Nuclear Regulatory Commission (NRC) for the fourth Inservice Inspection (ISI) interval at Calvert Cliffs Nuclear Power Plant, Units 1 and 2. In RR ISI-04-25, the licensee requested relief from the examination coverage requirements of Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), applicable to certain ASME Code Class 1 and 2 component welds.

The U.S. Nuclear Regulatory Commission staff has reviewed the information provided in the LAR and has determined that additional information is needed to complete its review. The request for additional information (RAI) was discussed with you on September 29, 2020, and it was agreed that your response would be provided within 30 days of the date of this email.

RAI

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Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(g)(5)(iii), the licensee requested relief on the basis that achieving the ASME Code-required examination coverage for the subject welds in RR ISI-04-25 is impractical. Regulations in 10 CFR 50.55a(g)(5)(iii), state that when licensees determine that conformance with ASME Code requirements is impractical at their facility, they shall submit information to support this determination. 10 CFR 50.55a(g)(6)(i), states in part that the Commission will evaluate such requests based on impracticality, and may impose alternatives, giving due consideration to public safety and the burden imposed on the licensee.

The staff noted that for certain welds, the inspection reports in Attachments 2 and 3 to the letter dated June 18, 2020 did not include the following information:

- recordable indication(s),
- acceptable indication(s), or
- whether the examination was acceptable.

This information is necessary for the staff to evaluate the extent of active aging degradation in these components. The staff requests that the licensee provide the aforementioned information regarding examination results for each of the welds in the tables below.

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Unit 1

Component ID	Description	Page Numbers in Attachment
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		2
SG-11-W7	11B Primary Head to Cold Leg B Nozzle	Pages 5-11
SG-12-W6	12A Primary Head to Cold Leg A Nozzle	Pages 15-21
SG-12-W7	12B Primary Head to Cold Leg B Nozzle)	Pages 22-28
SG-11-W6	11A Primary to Cold Leg A Nozzle)	Pages 71-78
16-405A	Nozzle to Head Weld	Pages 56-60
16-405B	Nozzle to Head Weld	Pages 61-65
10-205A	Nozzle to Shell	Pages 79-81
10-205B	Nozzle to Shell	Pages 82-84

Unit 2

Component ID	Description	Page Numbers in Attachment 3
4-404	Lower Head Surge Line Nozzle,	Pages 2-14
4-405	Upper Head Spray Nozzle	Pages 15-22
SG-21-W7	Primary Head to Class "B" Nozzle Extension	Pages 23-30
10-205A	Outlet Nozzle at 0 Degrees	Pages 126-129
10-205B	Outlet Nozzle at 180 Degrees	Pages 130-133

Best Regards,
Michael L. Marshall, Jr.
Senior Project Manager

Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

301-415-2871

Docket Nos. 50-317 and 50-318