



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

December 10, 2020

LICENSEE: EXELON GENERATION COMPANY, LLC

FACILITIES: BRAIDWOOD STATION, UNITS 1 AND 2; BYRON STATION, UNIT NOS. 1 AND 2; CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2; 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; QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2; AND R. E. GINNA NUCLEAR POWER PLANT

SUBJECT: SUMMARY OF NOVEMBER 13, 2020, MEETING WITH EXELON GENERATION COMPANY, LLC REGARDING A PLANNED REQUEST FOR AN ALTERNATIVE TO CERTAIN DOCUMENTATION REQUIREMENTS FOR THE REPLACEMENT OF PRESSURE RETAINING BOLTING (EPID L-2020-LRM-0102)

On November 13, 2020, a Category 1 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC or Commission) staff and representatives of Exelon Generation Company, LLC (Exelon, the licensee). The purpose of the meeting was to discuss a proposed alternative to certain documentation requirements for the replacement of pressure retaining bolting the subject facilities. The meeting notice and agenda are available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML20304A229. A copy of Exelon's presentation is available in ADAMS at Accession No. ML20303A175. A list of attendees is enclosed.

The NRC regulations in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a, "Codes and standards," include, in part, requirements for the use of Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPV Code). The regulation in 10 CFR 50.55a(z) allows the NRC staff to approve proposed alternatives to the ASME BPV Code requirements if the licensee demonstrates that: (1) the proposed alternative would provide 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.

Section XI of the ASME BPV Code includes, in part, documentation requirements for repair and replacement activities. As discussed in its presentation, Exelon has "observed that a major amount of resources are being applied to [repair and replacement] activities associated with routine bolting replacements which are not the result of inservice degradation." Exelon also stated that, although not required by regulation or the ASME BPV Code, repair and replacement plans are often prepared as a contingency for outage preparation. Exelon estimated that about 20 percent of these contingency plans are actually used.

Exelon stated that it planned to request the alternative under paragraph of 10 CFR 50.55a(z)(2) because the administrative burden of preparing the documentation for replacement of bolting is a hardship. The NRC staff noted that administrative burden is typically not considered to be a hardship under 10 CFR 50.55a(z)(2). Exelon indicated that they understood and would consider addressing the requirements of 10 CFR 50.55a(z)(1) instead.

As discussed in Slide 6 of Exelon's presentation, Exelon's proposed alternative would limit application of its repair and replacement program, as it relates to bolting, to bolting that is not currently associated with bolting categories subject to inservice inspection. The proposed alternative would apply to ASME Code Class 1, 2, and 3 components and would include safety-related equipment. Documentation would still occur through the normal processes of procurement, planning, and maintenance performed under Exelon's quality assurance program. The bolting material would be documented in work orders. Exelon is not proposing any changes to its quality assurance program in connection with this proposed alternative.

The NRC staff asked if Exelon considered working through ASME to change the requirements in Section XI of the ASME BPV Code. Exelon indicated that it has been working with ASME on a more general effort to change repair and replacement requirements. However, Exelon noted that working through ASME would take too long for this proposal.

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).

/RA/

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

Docket Nos. STN 50-456, STN 50-457,  
STN 50-454, STN 50-455, 50-317, 50-318,  
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, 50-265, and 50-244

Enclosure:  
List of Attendees

cc: Listserv

LIST OF ATTENDEES

NOVEMBER 13, 2020, MEETING WITH EXELON GENERATION COMPANY, LLC

| <b>Name</b>         | <b>Affiliation</b> |
|---------------------|--------------------|
| Blake Purnell       | NRC                |
| Yamir Diaz-Castillo | NRC                |
| John Tsao           | NRC                |
| Daniel Widrevitz    | NRC                |
| Hipo Gonzalez       | NRC                |
| David Rudland       | NRC                |
| Stephen Cumblidge   | NRC                |
| John Bozga          | NRC                |
| Kerri Kavanagh      | NRC                |
| Eric Reichelt       | NRC                |
| Thomas Loomis       | Exelon             |
| Brendan Casey       | Exelon             |
| Gene Nabratil       | Exelon             |

Enclosure

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ALTERANTIVE TO CERTAIN DOCUMENTATION REQUIREMENTS FOR THE  
REPLACEMENT OF PRESSURE RETAINING BOLTING  
(EPID L-2020-LRM-0102) DATED DECEMBER 10, 2020

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MMcCoppin, EDO  
SCumblidge, NRR  
JTsao, NRR  
DRudland, NRR  
JBozga, NRR  
YDiazCastillo, NRR  
DWidrevitz, NRR  
CDeMessieres, NRR  
RMurray, NRR

**ADAMS Accession No.: ML20342A352 (Meeting Summary)**

| OFFICE | NRR/DORL/LPL3/PM | NRR/DORL/LPL3/LA | NRR/DORL/LPL3/BC | NRR/DORL/LPL3/PM |
|--------|------------------|------------------|------------------|------------------|
| NAME   | BPurnell         | SRohrer          | NSalgado         | BPurnell         |
| DATE   | 12/9/20          | 12/9/20          | 12/10/20         | 12/10/20         |

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