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10 CFR 50.55a

RS-21-070  
NMP2L2773

June 30, 2021

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

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, Unit 2  
Renewed Facility Operating License No. NPF-69  
NRC Docket No. 50-410

Subject: Proposed Alternative to Utilize Code Case N-893

References: 1) Letter from D. Gudger (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Proposed Alternative to Utilize Code Case N-893," dated November 16, 2020 (ML20321A234)

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- 2) Letter from B. Purnell (U.S. Nuclear Regulatory Commission) to D. Rhoades (Exelon Generation Company, LLC), "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; LaSalle County Station, Units 1 and 2; Limerick Generating Station, Units 1 and 2; and Nine Mile Point Nuclear Station, Unit 2 - Request for Additional Information Regarding Proposed Alternative to Use ASME Code Case N-893 (EPIDS L-2020-LLR-0147 and L-2020-LLR-0148)," dated May 5, 2021 (ML21117A034)

In the Reference 1 letter, in accordance with 10 CFR 50.55a(z)(1), Exelon Generation Company, LLC (Exelon) requested a proposed alternative 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 the proposed alternative provides an acceptable level of quality and safety, equivalent to compliance with ASME Section III and XI requirements. Specifically, this proposed alternative concerns the use of Code Case N-893, "Use of Alloy Steel Bar and Mechanical Tubing in Class 2 and 3 Patented Mechanical Joints and Fittings, Section III, Division 1." This Code Case allows the use of a material that does not comply with the limitations on material specifications and grades mandated by ASME Section III.

In the Reference 2 letter, the U.S. Nuclear Regulatory Commission requested additional information. Attached is our response.

Attachments 4 and 5 contain information proprietary to Lokring Technology, LLC (Lokring). Lokring requests that these documents be withheld from public disclosure in accordance with 10 CFR 2.390(b)(4). An Affidavit supporting this request is contained in Attachment 3.

There are no regulatory commitments contained in this letter.

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

Respectfully,

*David T. Gudger*

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David T. Gudger – Senior Manager  
Licensing and Regulatory Affairs  
Exelon Generation Company, LLC

- Attachments: 1) Response to Request for Additional Information (Non-Confidential Information)
- 2) Executive Summary - Crevice Corrosion Test of Lokring LTSC-333 and Socket weld Fittings (Non-Confidential Information)
  - 3) Affidavit
  - 4) Exhibit A - Response to Request for Additional Information (Confidential Information)
  - 5) Exhibit B - Executive Summary - Crevice Corrosion Test of Lokring LTSC-333 and Socket weld Fittings (Confidential Information)

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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 - LaSalle County Station  
NRC Senior Resident Inspector - Limerick Generating Station  
NRC Senior Resident Inspector - Nine Mile Point Nuclear Station  
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 - LaSalle County Station  
NRC Project Manager - Limerick Generating Station NRC  
NRC Project Manager - Nine Mile Point Nuclear Station  
Illinois Emergency Management Agency – Division of Nuclear Safety  
W. DeHaas, Commonwealth of Pennsylvania  
S. Seaman, State of Maryland  
A. L. Peterson, NYSERDA

**Attachment 3  
Affidavit**

### ATTACHMENT 3

#### AFFIDAVIT

I, William H. Lennon, the sole member and President of Lokring Technology, LLC do hereby affirm and state:

1. I am the sole member and President of Lokring Technology, LLC, and I am authorized to execute this Affidavit on behalf of Lokring Technology, LLC. I am further authorized to review information submitted to the Nuclear Regulatory Commission (NRC) and apply for the withholding of information from disclosure.
2. Lokring Technology, LLC is providing information pursuant to 10 CFR 50.55a, of and concerning its proprietary LTCS-333 product. The information being provided constitutes proprietary trade secret information that should be held in confidence by the NRC pursuant to the policy reflected in 10 CFR 2.390(a)(4), because:
  - i. The contents of Attachment 4 (Response to Request for Additional Information) and in Attachment 5 (Executive Summary- Crevice Corrosion Test of Lokring LTSC-333 and Socket Weld Fittings) each contain information ("Information") that is and has been held in confidence by Lokring Technology, LLC. The referenced Attachment 4 and Attachment 5 are attached hereto as Exhibits A and B, respectively;
  - ii. This Information is of a type that is held in confidence by Lokring Technology, LLC and there is a rational basis for doing so because the Information contains sensitive trade secret information concerning Lokring Technology, LLC's product design and testing details;
  - iii. This Information is being transmitted to the NRC in confidence;
  - iv. This Information is not available in public sources and could not be gathered readily from other publicly available information; and
  - v. Public disclosure of this Information would create substantial harm to the competitive position of Lokring Technology, LLC by disclosing Lokring Technology, LLC's product design and testing details to other parties whose commercial interests may be adverse to those of Lokring Technology, LLC.
3. Accordingly, Lokring Technology, LLC requests that the designated documents be withheld from public disclosure pursuant to the policy reflected in 10 CFR 2.390(a)(4)

and that prompt written notice be provided to Lokring Technology, LLC of any request for disclosure of Lokring Technology, LLC's trade secret or confidential information, as well as the maximum amount of time available under the applicable statute to object in writing to any disclosure of such Information.

Lokring Technology, LLC



William H. Lennon, sole member and President of Lokring Technology, LLC

STATE OF OHIO                    )  
  ) ss.  
COUNTY OF LAKE                )

Before me, a Notary Public, in and for said County and State, personally appeared Mr. William H. Lennon, the sole member and President of Lokring Technology, LLC, who acknowledged that he did execute the foregoing Affidavit in his capacity as the duly authorized officer of Lokring Technology, LLC, and such execution is his free act and deed.



MARY C. JACKSON  
NOTARY PUBLIC, STATE OF OHIO  
My Commission Expires 8/13/2024

  
Notary Public                    June 28, 2021