



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

September 22, 2021

Mr. David Rhoades
Senior VP, Exelon Generation Co., LLC
President and CNO, Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: DRESDEN NUCLEAR POWER STATION UNIT 2—NOTIFICATION OF NRC
BASELINE INSPECTION AND REQUEST FOR INFORMATION; INSPECTION
REPORT 05000237/2021004; 05000249/2021004

Dear Mr. Rhoades:

On November 1, 2021, the U.S. Nuclear Regulatory Commission (NRC) will begin the Baseline Inservice Inspection Procedure 71111.08. This onsite inspection is scheduled to be performed November 1, 2021, through November 12, 2021.

Experience has shown that this inspection is resource intensive both for the NRC inspector and your staff. In order to minimize the impact to your onsite resources, and to ensure a productive inspection for both sides, we have enclosed a request for documents needed for this inspection. These documents have been divided into two groups.

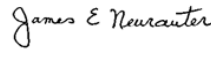
The first group identifies information necessary to ensure that the inspector is adequately prepared. The second group identifies the information the inspector will need upon arrival at the site. It is important that all of these documents are up-to-date, and complete, in order to minimize the number of additional documents requested during the preparation and/or the onsite portions of the inspection.

We have discussed the schedule for inspection activities with your staff and understand that our regulatory contact for this inspection will be Mr. D. Walker, of your organization. If there are any questions about this inspection or the material requested, please contact the lead inspector Mr. J. Neurauter at 630-829-9828, or via e-mail at james.neurauter@nrc.gov.

This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget, Control Number 3150-0011. The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget Control Number.

This letter and its enclosure will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations*, Part 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

 Signed by Neurauter, James
on 09/22/21

James E. Neurauter, Reactor Inspector
Engineering Branch 1
Division of Reactor Safety

Docket Nos. 50-237, 50-249
License Nos. DPR-19; DPR-25

Enclosure:
Document Request for Baseline Inservice
Inspection

cc: Distribution via LISTSERV®

Letter to David Rhoades from James E. Neurauter dated September 22, 2021.

SUBJECT: DRESDEN NUCLEAR POWER STATION UNIT 2—NOTIFICATION OF NRC
BASELINE INSPECTION AND REQUEST FOR INFORMATION; INSPECTION
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DOCUMENT REQUEST FOR BASELINE INSERVICE INSPECTION

Inspection Report: 05000237/2021004; 05000249/2021004

Inspection Dates: November 01, 2021 – November 12, 2021

Inspection Procedures: Inspection Procedure 71111-08, "Inservice Inspection"

Lead Inspector: James E. Neurauter, DRS
630-829-9828
james.neurauter@nrc.gov

A. *Information for the In-Office Preparation Week*

The following information (electronic copy CD ROM if possible) is requested by October 15, 2021, to facilitate the selection of specific items that will be reviewed during the onsite inspection week. The inspector will select specific items from the information requested below and request a list of additional documents needed onsite to your staff. We request that the specific items selected from the lists be available and ready for review on the first day of inspection. If you have any questions regarding this information, please call the inspector as soon as possible.

1. For the upcoming outage, a detailed schedule and description of:
 - a. Non-Destructive Examinations (NDEs) planned for Class 1 and 2 Systems and containment, performed as part of your American Society of Mechanical Engineers (ASME) Code Inservice Inspection (ISI) Program (include edition and addenda of Code committed to), and NDEs planned for other systems performed as part of a Risk-Informed ISI Program, or other augmented inspection programs commitments, as part of an industry initiative; and
 - b. Welding on Code Class 1, 2, or 3 components. For each weld examination, include the weld identification number, description of weld (component name), category, class, type of exam and procedure number, and date of examination.
2. A copy of the NDE procedures and welding procedures used to perform the activities identified in A.1 (including NDE calibration and flaw characterization/sizing procedures and Welding Procedure Qualification Records). For ultrasonic examination procedures qualified in accordance with Appendix VIII, of Section XI of the ASME Code, provide documentation supporting the procedure qualification (e.g., the Electric Power Research Institute performance demonstration qualification summary sheets).
3. A copy of ASME Section XI, Code Relief Requests applicable to the examinations identified in A.1.
4. A copy of the 10-year ISI Program showing those required exams scheduled to be performed this outage, and those which have been completed.

Enclosure

DOCUMENT REQUEST FOR BASELINE INSERVICE INSPECTION

5. A list identifying NDE reports (ultrasonic, radiography, magnetic particle, or dye penetrant), which have identified relevant indications on Code Class 1 and 2 systems since the beginning of the last refueling outage.
6. List with short description of the welds in Code Class 1, 2 and 3 systems, which have been fabricated due to component repair/replacement activities since the beginning of the last refueling outage and identify the system, weld number, and reference applicable documentation (e.g., NIS-2 forms with definitions of system and component acronyms).
7. If reactor vessel weld examinations required by the ASME Code are scheduled to occur during the inspection period, provide a detailed description of the welds to be examined, and the extent of the planned examination.
8. List with description of ISI-related issues such as piping degradation or damage (e.g., cracks, wall thinning, wear, microbiologically induced corrosion) or errors identified in piping examinations that have been entered into your corrective action system since the beginning of the last refueling outage. Also, include a list of corrective action records associated with foreign material introduced/identified in the reactor vessel or reactor coolant system since the beginning of the last refueling outage.

In addition, provide a list of all corrective action records for operating experience (OE) associated with pipe wall thinning of the bottom head drain line (BHDL), as applicable. Specifically, any site actions to address pipe wall thinning as identified in BWRVIP-205: BWR Vessel and Internals Project Bottom Head Drain Line Inspection and Evaluation Guidelines.

9. Copy of any Title 10 of the *Code of Federal Regulations*, Part 21 reports applicable to your structures, systems, or components within the scope of Section XI of the ASME Code that have been identified since the beginning of the last refueling outage.
10. Point of contact information (name and site number) for the Inservice Inspection Program, Aging Management Programs, Site Welding Engineer, and Reactor Internals Inspection Programs—Site and vendor leads.

B. *Onsite Information to Be Provided to the Inspector on the First Day of the Inspection (e.g., Following the Entrance Meeting). Please Provide Hard Copies (e.g., Paper Records) of the Following Documents.*

1. For welds selected by the inspector from A.1.b and A.6 above, provide copies of the following documents:
 - a. Document of the weld number and location (e.g., system, train, branch);
 - b. Document with a detail of the weld construction (e.g., drawing);
 - c. Applicable portions of the Design Specification and applicable Code of construction for the weldment (e.g., B31.1 or ASME Section III);

DOCUMENT REQUEST FOR BASELINE INSERVICE INSPECTION

- d. Applicable Code Edition and Addenda for weld procedure qualification;
 - e. Applicable weld procedure specifications and completed weld data sheets used to fabricate the welds;
 - f. Copies of procedure qualification records supporting the weld procedure specifications;
 - g. Copies of welders' performance qualification records;
 - h. Copies of mechanical test reports identified in the procedure qualification records above;
 - i. Copies of the non-conformance reports for the selected welds;
 - j. Access to radiographs and equipment to view radiographs of the selected welds;
 - k. ASME Code Section XI repair replacement plan and reconciliation for replacement components/materials;
 - l. Certified Material Test Reports for replacement pressure boundary materials; and
 - m. Copies of the NDE required by the construction Code and the pre-service examination records required by the ASME Code Section XI for the selected welds.
2. For the ISI-related corrective action issues selected by the inspector from Item A.6 above, provide a copy of the corrective actions and supporting documentation.
 3. For the NDE reports with relevant indications on Code Class 1 and 2 systems selected by the inspector from Item A.5 above, provide a copy of the examination records and associated corrective action documents.
 4. Updated schedules for Item A.1 (including schedule showing contingency repair plans if available).
 5. Fabrication Drawings (D size) of the reactor vessel welds if any are to be examined during the outage. Also provide any drawings used by NDE vendors to locate these welds.
 6. Provide copies of the following standards at the onsite U.S. Nuclear Regulatory Commission inspection location for the duration of the inspection:
 - a. Sections V, IX, and XI of the ASME Code with Editions applicable to the ISI Program and the Repair/Replacement Program; and
 - b. Copy of the performance demonstration initiative (PDI) generic procedures with the latest applicable Revisions that support site qualified ultrasonic examination of piping welds and components (e.g., PDI-UT-1, PDI-UT-2, PDI-UT-3, PDI-UT-10 etc.).

DOCUMENT REQUEST FOR BASELINE INSERVICE INSPECTION

7. Provide training (e.g., Scaffolding, Fall Protection, Foreign Material Exclusion) if required to access the NDE selected by the inspector for observation.

If you have questions regarding the information requested, please contact the lead inspector.