



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

February 8, 2023

Mr. David P. Rhoades  
Senior Vice President  
Constellation Energy Generation, LLC  
President and Chief Nuclear Officer  
Constellation Nuclear  
4300 Winfield Road  
Warrenville, IL 60555-4012

SUBJECT: BRAIDWOOD STATION, UNITS 1 AND 2, BYRON STATION, UNIT NOS. 1 AND 2, CALVERT CLIFFS NUCLEAR STATION, UNITS 1 AND 2, AND R. E. GINNA STATION – FORWARD FIT ANALYSIS (EPIDS L-2022-LRR-0074, 0076, 0079, 0091, 0092, 0093 AND 0094)

Dear Mr. Rhoades:

By letter dated September 20, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22263A440), Constellation Energy Generation, LLC, (Constellation) supplemented its requests for alternatives for examinations of certain steam generator welds dated September 1, 2021 (ML21244A328), and December 14, 2021 (ML21348A078). The supplement referenced U.S. Nuclear Regulatory Commission (NRC) staff discussions of performance monitoring plans in relation to its review of the proposed alternatives and requested a forward fit<sup>1</sup> analysis “prior to any staff action to condition the approval of [Constellation]’s requests upon implementation of a performance monitoring plan.” This letter responds to your request.

Constellation submitted the requests for alternatives pursuant to Title 10 of the *Code of Federal Regulations* 50.55a(z)(1), which requires demonstration that the proposed alternative would provide an acceptable level of quality and safety. The NRC, in its request for additional information (RAI) dated May 6, 2022 (ML22129A013), specifically identified in its regulatory basis that the RAI was needed to demonstrate an acceptable level of quality and safety.

The proposed alternatives eliminate inspections or significantly extend the period of time between inspections. The performance monitoring plan that is the subject of the licensee’s request for a forward fit analysis would include the continued performance of certain inspections that are already required by the ASME Code and are intended to demonstrate an acceptable

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<sup>1</sup> NRC Management Directive 8.4 (ML18093B087) defines a forward fit as “the imposition of a new or modified requirement or regulatory staff interpretation of a requirement that results in the modification of or addition to systems, structures, components, or design of a facility; or the design approval or manufacturing license for a facility; or the procedures or organization required to design, construct or operate a facility as a condition of approval by the NRC of a licensee-initiated request for a licensing action when the underlying request did not propose to comply with the new or revised requirement or interpretation.”

level of quality and safety for the proposed alternative. The ASME Code inspection requirements are essentially a performance monitoring plan that monitors the performance of the welds that are required to be inspected. Constellation may propose an alternative performance monitoring plan that reduces the requirements of the ASME Code as long as the continued performance of specific inspections demonstrate an acceptable level of quality and safety. The proposed alternative performance monitoring plan is not a new or modified requirement or a new or modified regulatory staff interpretation of a requirement. Therefore, the NRC staff concludes that a forward fit would not occur if authorization of the proposed alternatives is contingent upon implementing the performance monitoring plan discussed in the licensee's supplement.

If you have any questions, please contact me at 301-415-6606 or via e-mail at [Joel.Wiebe@nrc.gov](mailto:Joel.Wiebe@nrc.gov)

Sincerely,

*/RA/*

Joel S. Wiebe, Senior Project Manager  
Plant Licensing Branch III  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

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

cc: Listserv

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