



200 Exelon Way  
Kennett Square, PA 19348  
[www.exeloncorp.com](http://www.exeloncorp.com)

10 CFR 50.55a

RS-22-126

NMP1L3483

November 30, 2022

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

Dresden Nuclear Power Station, Units 2 and 3  
Renewed Facility Operating License Nos. DPR-19 and DPR-25  
NRC Docket Nos. 50-237 and 50-249

James A. FitzPatrick Nuclear Power Plant  
Renewed Facility Operating License No. DPR-59  
NRC Docket No. 50-333

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, Units 1 and 2  
Renewed Facility Operating License Nos. DPR-63 and NPF-69  
NRC Docket Nos. 50-220 and 50-410

Peach Bottom Atomic Power Station, Units 2 and 3  
Renewed Facility Operating License Nos. DPR-44 and DPR-56  
NRC Docket Nos. 50-277 and 50-278

Quad Cities Nuclear Power Station, Units 1 and 2  
Renewed Facility Operating License Nos. DPR-29 and DPR-30  
NRC Docket Nos. 50-254 and 50-265

R. E. Ginna Nuclear Power Plant  
Renewed Facility Operating License No. DPR-18  
NRC Docket No. 50-244

Subject: Request to Use Provisions of a Later Edition of the ASME Boiler and Pressure Vessel Code, Section XI

Reference: NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," dated July 28, 2004

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(4)(iv), and the guidance provided in the referenced document, Constellation Energy Generation, LLC (CEG) requests NRC approval to use a specific provision of a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, incorporated in 10 CFR 50.55a(a)(1)(ii), for the units identified above. Specifically, CEG requests approval to use IWA-6220 ("Owner's Repair/Replacement Certification Record"), IWA-6230 ("Owners Activity Report"), and Mandatory Appendix II ("Owner's Record and Report") of the 2019 Edition of the ASME B&PV Code, Section XI for post outage reporting requirements.

CEG requests approval of this request by April 30, 2023 to allow implementation for Spring 2023 outage summary reports. There are no regulatory commitments in this letter.

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

Respectfully,



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David T. Gudger  
Senior Manager - Licensing & Regulatory Affairs  
Constellation Energy Generation, LLC

U.S. Nuclear Regulatory Commission  
Request to Use Provisions of a  
Later Edition of the ASME B&PV Code, Section XI  
November 30, 2022  
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Attachment: Request to Use Portions of a Later Edition of the ASME B&PV Code, Section XI

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 - Dresden Nuclear Power Station  
NRC Senior Resident Inspector - James A. FitzPatrick Nuclear Power Plant  
NRC Senior Resident Inspector - LaSalle County Station  
NRC Senior Resident Inspector - Limerick Generating Station  
NRC Senior Resident Inspector - Nine Mile Point Nuclear Station  
NRC Senior Resident Inspector - Peach Bottom Atomic Power Station  
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station  
NRC Senior Resident Inspector - R.E. Ginna Nuclear Power Plant  
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 - Dresden Nuclear Power Station  
NRC Project Manager - James A. FitzPatrick Nuclear Power Plant  
NRC Project Manager - LaSalle County Station  
NRC Project Manager - Limerick Generating Station  
NRC Project Manager - Nine Mile Point Nuclear Station  
NRC Project Manager - Peach Bottom Atomic Power Station  
NRC Project Manager - Quad Cities Nuclear Power Station  
NRC Project Manager - R.E. Ginna Nuclear Power Plant  
Illinois Emergency Management Agency - Division of Nuclear Safety  
Director, Bureau of Radiation Protection - Pennsylvania Department of  
Environmental Resources  
W. DeHaas - Pennsylvania Bureau of Radiation Protection  
S. Seaman - State of Maryland  
A. L. Peterson - NYSERDA

**Attachment**

**Request to Use Portions of a Later Edition of the  
ASME B&PV Code, Section XI**

**Proposed Use of Subsequent ASME Code Edition and Addenda  
In Accordance with 10 CFR 50.55a(g)(4)(iv)  
Page 1**

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(4)(iv) and the guidance provided in Reference 1, Constellation Energy Generation, LLC (CEG) requests NRC approval to use specific provisions of a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, incorporated in 10 CFR 50.55a(a)(1)(ii), for Braidwood Station, Units 1 and 2, Byron Station, Units 1 and 2, Calvert Cliffs Nuclear Power Plant, Units 1 and 2, Clinton Power Station, Unit 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. Specifically, CEG requests approval to use IWA-6220 ("Owners Repair/Replacement Certification Record"), IWA-6230 ("Owners Activity Report"), and Mandatory Appendix II ("Owner's Record and Report") of the 2019 Edition of the ASME B&PV Code, Section XI for post outage reporting requirements.

**1. Component(s) Affected**

All Class 1, 2, 3, MC, and CC items.

**2. Requested Date for Approval**

Approval is requested by April 30, 2023 to allow implementation for Spring 2023 outage summary reports.

**3. Applicable Code Edition and Addenda**

<u>PLANT</u>	<u>INTERVAL</u>	<u>EDITION</u>	<u>START</u>	<u>END</u>
Braidwood Station, Units 1 and 2	Fourth	2013 Edition	August 29, 2018 November 5, 2018	July 28, 2028 October 16, 2028
Byron Station, Units 1 and 2	Fourth	2007 Edition, through 2008 Addenda	July 16, 2016	July 15, 2025
Calvert Cliffs Nuclear Power Plant, Units 1 and 2	Fifth	2013 Edition	July 1, 2019	June 30, 2029
Clinton Power Station, Unit 1	Fourth	2013 Edition	July 1, 2020	June 30, 2030
Dresden Nuclear Power Station, Units 2 and 3	Sixth	2017 Edition	January 20, 2023	January 19, 2033
James A. FitzPatrick Nuclear Power Plant	Fifth	2007 Edition, through 2008 Addenda	August 1, 2017	June 15, 2027
LaSalle County Stations, Units 1 and 2	Fourth	2007 Edition, through 2008 Addenda	October 1, 2017	September 30, 2027

**Proposed Use of Subsequent ASME Code Edition and Addenda  
In Accordance with 10 CFR 50.55a(g)(4)(iv)  
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<u>PLANT</u>	<u>INTERVAL</u>	<u>EDITION</u>	<u>START</u>	<u>END</u>
Limerick Generating Station, Units 1 and 2	Fourth	2007 Edition, through 2008 Addenda	February 1, 2017	January 31, 2027
Nine Mile Point Nuclear Station, Unit 1	Fifth	2013 Edition	August 23, 2019	August 22, 2029
Nine Mile Point Nuclear Station, Unit 2	Fourth	2013 Edition	August 23, 2018	August 22, 2028
Peach Bottom Atomic Power Station, Units 2 and 3	Fifth	2013 Edition	January 1, 2019	December 31, 2028
Quad Cities Nuclear Power Station, Units 1 and 2	Sixth	2017 Edition	April 2, 2023	April 1, 2033
R. E. Ginna Nuclear Power Plant	Sixth	2013 Edition	January 1, 2020	December 31, 2029

**4. Proposed Subsequent Code Edition and Addenda (or Portion)**

Pursuant to 10 CFR 50.55a(g)(4)(iv), CEG requests permission to use IWA-6220 ("Owner's Repair/Replacement Certification Record"), IWA-6230 ("Owner's Activity Report"), and Mandatory Appendix II ("Owner's Record and Report") of the 2019 Edition of the ASME B&PV Code in place of similar post outage reporting requirement in the editions of the ASME B&PV Code contained in Table 1 below. These requirements pertain to the preparation and submittal of the OAR-1 report (2019 and 2017 Edition) and the NIS-1 report (2013 and 2007 Edition/2008 Addenda). In summary, the 2019 Edition of the ASME B&PV Code incorporates the alternate repair/replacement activity documentation and Inservice Inspection summary report preparation and submission requirements of Code Case N-532-5 (2013 and 2007 Edition/2008 Addenda) and extends the submittal time of the OAR-1 outage summary report from 90 days to 120 days (2017 Edition, 2013 Edition, 2007 Edition/2008 Addenda). 10 CFR 50.55a(a)(1)(ii) incorporates by reference the 2019 Edition of ASME Section XI, Division 1 of the ASME B&PV Code as approved in Reference 2.

**Proposed Use of Subsequent ASME Code Edition and Addenda  
In Accordance with 10 CFR 50.55a(g)(4)(iv)  
Page 3**

**Table 1**

<u>Code of Record</u>	<u>Impacted Code Sections</u>
2017 Edition	<ul style="list-style-type: none"> <li>• IWA-6220, "Owner's Repair/Replacement Certification Record"</li> <li>• IWA-6230, "Owner's Activity Report"</li> <li>• Mandatory Appendix II, "Owner's Record and Report"</li> </ul>
2013 Edition	<ul style="list-style-type: none"> <li>• IWA-6220, "Preparation of Abstract of Examination Required by Form NIS-1"</li> <li>• IWA-6230, "Summary Report Preparation"</li> <li>• IWA-6240, "Summary Reports"</li> <li>• Mandatory Appendix II, "Owners Report for Inservice Inspections"</li> </ul>
2007 Edition, through 2008 Addenda	<ul style="list-style-type: none"> <li>• IWA-6220, "Preparation of Abstract of Examination Required by Form NIS-1"</li> <li>• IWA-6230, "Summary Report Preparation"</li> <li>• IWA-6240, "Summary Report Submittal"</li> <li>• Mandatory Appendix II, "Owner's Report for Inservice Inspections"</li> </ul>

**5. Related Requirements**

10 CFR 50.55a(g)(4)(iv) states:

*"Inservice examination of components and system pressure tests may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (a) of this section, subject to the conditions listed in paragraph (b) of this section, and subject to Commission approval. Portions of editions or addenda may be used, provided that all related requirements of the respective editions or addenda are met."*

Section IWA-6220, IWA-6230, and Mandatory Appendix II of the 2019 Edition of ASME Section XI include all related requirements in this request.

**6. Duration of Proposed Request**

The duration of this request will continue for each site's Inservice Inspection interval as provided in Section 3.

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**Proposed Use of Subsequent ASME Code Edition and Addenda  
In Accordance with 10 CFR 50.55a(g)(4)(iv)  
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**7. References**

1. NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," dated July 28, 2004.
2. Federal Register, 87 FR 65128, dated October 27, 2022

**8. Precedents**

None