

From: Scott Wall
Sent: Tuesday, December 20, 2022 2:33 PM
To: Loomis, Thomas R:(Constellation)
Cc: Helker, David P:(Constellation Nuclear); Hodge, Jessie D:(Constellation Nuclear)
Subject: Constellation Energy Generation, LLC – Fleet Request – Acceptance of Request to Use Certain Provisions of the 2019 Edition of the ASME BPV Code, Section XI (EPID: L-2022-LLR-0083)

Dear Mr. Loomis:

By letter dated November 30, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22334A136), Constellation Energy Generation, LLC (CEG, the licensee) requested to use a provision of a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code, Section XI, at the following units:

- 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
- R. E. Ginna Nuclear Power Plant

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 BPV Code, Section XI for post outage reporting requirements.

The purpose of this e-mail is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this alternative request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant. Pursuant to Sections 50.55a(z)(1) and 50.55a(z)(2) of Title 10 of the *Code of Federal Regulations* (10 CFR), the applicant shall demonstrate that the proposed alternatives would provide an acceptable level of quality and safety, or that compliance with the specified requirements of Section 50.55a would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed exemption in

terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. If additional information is needed, you will be advised by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this review will take approximately **90 hours** to complete. The NRC staff expects to complete this review by **June 30, 2023**. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager.

These estimates are based on the NRC staff's initial review of the application and they could change, due to several factors including requests for additional information, and unanticipated addition of scope to the review. Additional delay may occur if the submittal is provided to the NRC in advance or in parallel with industry program initiatives or pilot applications.

If you have any questions, please contact me at (301) 415-2855 or e-mail at Scott.Wall@nrc.gov.

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From: Scott Wall

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Tracking Status: None

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Tracking Status: None

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