



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

March 1, 2024

David P. Rhoades
Senior Vice President
Constellation Energy Generation, LLC
President and Chief Nuclear Officer (CNO)
Constellation Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: DRESDEN GENERATING STATION – REQUEST FOR INFORMATION FOR
THE NRC AGE-RELATED DEGRADATION INSPECTION: INSPECTION
REPORT 05000237/2024010 and 05000249/2024010

Dear David P. Rhoades:

The purpose of this letter is to notify you that the U.S. Nuclear Regulatory Commission (NRC) staff will conduct IP 71111.21N.04, "Age-Related Degradation" baseline inspection at Dresden Generating Station, Units 2 and 3, beginning June 10, 2024. The inspection will be conducted in accordance with IP 71111.21N.04, dated December 15, 2023.

The schedule for the inspection is as follows:

- Information gathering visit - week of April 1, 2024 (Tentative)
- On-site inspection - weeks of June 10, 2024, and June 24, 2024

The purpose of the information gathering visit is to become familiar with the station maintenance, surveillance, testing, inspection, and condition monitoring programs, become familiar with plant layout, support identification of structures, systems, and components (SSCs) that will be reviewed during the inspection, and, as necessary, obtain plant-specific site access training and badging for unescorted site access. An initial list of documents that the team will review during the information gathering visit is listed in enclosure 1.


For SSCs that the inspection team plans to review, an initial list of the documents the team plans to review during the conduct of the inspection are listed in enclosure 2. The team leader will contact you with identified SSCs. Also, personnel should be available at the site during the inspection who are knowledgeable regarding maintenance, surveillance, testing, inspection, and condition monitoring programs.

The lead inspector for this inspection is Edison Fernandez. We understand that our regulatory contact for this inspection is Tara Noah of your organization. If there are any questions about the inspection or the material requested, please contact the lead inspector at 630-829-9754 or via email at edison.fernandez@nrc.gov.

This letter contains voluntary information collections that are subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). The Office of Management and Budget (OMB) approved these information collections (approval number 3150-0011). The burden to the public for these information collections is estimated to average 42 hours per response. Send comments regarding this information collection to the FOIA, Library and Information Collection Branch, Office of the Chief Information Officer, Mail Stop: T6-A10M, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by email to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0011) OMB, Washington, DC 20503.

In accordance with Title 10 of the *Code of Federal Regulations* (CFR) 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response (if any) will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records System (PARS) component of NRC's Agencywide Document Access and Management System (ADAMS). ADAMS is accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,



Signed by Fernandez, Edison
on 03/01/24

Edison Fernandez
Senior Reactor Inspector
Engineering and Reactor Projects Branch
Division of Operating Reactor Safety

Docket Nos. 05000237 and 05000249
License Nos. DPR-19 and DPR-25

Enclosure:

1. Requested Information to Support Age-Related Degradation Sample Selection
2. Requested Information to Support Age-Related Degradation Inspection

cc: Distribution via LISTSERV®

Letter to David P. Rhoades from Edison Fernandez dated March 1, 2024.

SUBJECT: DRESDEN GENERATING STATION – REQUEST FOR INFORMATION FOR THE NRC AGE-RELATED DEGRADATION INSPECTION: INSPECTION REPORT 05000237/2024010 and 05000249/2024010

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Enclosure 1 – Requested Information to Support Age-Related Degradation Sample Selection

The documents and information requested below should generally be made available to the inspection team for the team's use both on-site and off-site during the information gathering visit. Electronic format is the preferred media. If electronic media is made available via an internet based remote document management system, then the remote document access should allow inspectors to download, save, and print the documents in the NRC's regional office. Electronic media on compact disc or paper records (hard copy) are acceptable. At the end of the inspection, the documents in the team's possession will not be retained.

This document request is based on typical documents that a generic plant might have. As such, this document request is not meant to imply that any specific plant is required to have all of the listed documents. In addition, your plant-specific document titles may vary from the document titles listed below.

The following information is requested by **April 8, 2024**, or sooner, to facilitate the sample selections.

Documents requested, if available:

1. List of 50.65 (a)(1) SSCs from the past 5 years
2. List of maintenance rule functional failures (including preventable) from the past 5 years
3. Most recent evaluation of maintenance effectiveness required per 10 CFR 50.65(a)(3)
4. Maintenance rule scoping and performance criteria document
5. List of preventative maintenance deferrals and preventative maintenance change requests in the last 5 years
6. Equipment reliability characterization and preventative maintenance program procedures
7. List of 10 CFR Part 21 Reports applicable to the site from the past 5 years
8. Site specific corrective actions associated with component failures, or tagged with "aging," "age-related," "wear," "accelerated wear," "abnormal wear," "accelerated degradation," "abnormal degradation," "corrosion," "degradation," etc.
9. List of technical specification operability determinations from the past 5 years
10. List of risk-significant long-lived passive SSCs (for licensees in the period of extended operation (PEO))
11. Aging management programs (AMPs) and any plant-specific or industry operating experience reviews that have been used to update aging management activities (for licensees in the period of extended operation)
12. List of top 100 most risk-significant structures and components. If possible, designate the component as active or passive in the risk ranking

13. List of RISC-1, RISC-2, and RISC-3 SSCs (**for licensees that implement 10 CFR 50.69**)
14. Safety significant functions identified during the RISC categorization process, and alternative treatment requirements (**for licensees that implement 10 CFR 50.69**)
15. Last feedback and process adjustment required per 10 CFR 50.69(e)(1) (**for license that implement 10 CFR 50.69**)
16. Site specific probabilistic risk assessment (PRA) identifying risk-significant functions
17. Technical specifications and technical requirements manual, including applicable bases documents
18. List of systems (system numbers/designators and corresponding names)

Enclosure 2: Requested Information to Support Age-Related Degradation Inspection

The team lead will identify samples (i.e., structures and components) after the information gathering visit. The documents and information requested below should generally be made electronically available to the inspection team for the team's use both on-site and off-site. At the end of the inspection, the documents in the team's possession should not be retained.

This document request is based on typical documents that a generic plant might have. As such, this document request is not meant to imply that any specific plant is required to have all the listed documents. In addition, your plant-specific document titles may vary from the document titles listed below. We also request that the information provided be sorted by the list below for each sample.

The following information is requested by **May 13, 2024**, or sooner, to facilitate the inspection.

1. List of corrective action documents for the last 10 years
2. Maintenance, surveillance, testing, inspection, and condition monitoring testing requirements, acceptance criteria, and periodicities
3. Bases documents associated with maintenance, surveillance, testing, inspection, and condition monitoring testing requirements, acceptance criteria, and periodicities
4. Last 2 years of maintenance, surveillance, testing, inspection, and condition monitoring testing results; for periodicities greater than 2 years, the last two test results.
5. Self-imposed and vendor recommendations
6. If available
 - a) Equipment reliability category/characterization (e.g., non-critical, run-to-maintenance, etc.)
 - b) Preventative maintenance templates for the maintenance strategy
 - c) System design basis documents and the specific updated final safety analysis report section that describes the function
 - d) Piping and instrumentation drawings (P&IDs) and electrical one-line drawings
 - e) Control circuit drawings
 - f) Design/procurement specifications
 - g) List of applicable modifications for the component

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