

From: Surinder Arora
Sent: Monday, March 4, 2024 3:24 PM
To: Mathews, Mitchel A:(Constellation Nuclear)
Cc: Jeff Whited
Subject: Dresden 2 and 3 - Request for Additional Information for Alternative Request I5R-22 (EPID: L-2023-LLR-0063)

Mr. Mathews,

As we discussed in the last biweekly status meeting, the following is the request for additional information (RAI) pertaining to the Alternative Request I5R-22 submitted by Constellation for Dresden, Units 2 and 3. Thanks for your email confirming that Constellation does not need a clarification call to discuss the RAI questions. Please provide your response to the staff's questions within 30 days, by April 3 from today (i.e., by April 3, 2024).

Thanks,
Surinder Arora, P.E.
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Fermi 2 and Dresden 2 & 3
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301-415-1421

REQUEST FOR ADDITIONAL INFORMATION
BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELIEF REQUEST I5R-22
FIFTH INSERVICE INSPECTION INTERVAL
CONSTELLATION ENERGY GENERATION, LLC
DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3
DOCKET NOS. 50-237 AND 50-249
EPID NO. L-2023-LLR-0063

Background

By letter dated November 8, 2023 (ML23312A092), Constellation Energy Generation, LLC (Constellation, the licensee), submitted relief request I5R-22 to the U.S. Nuclear Regulatory Commission (NRC) regarding limited examination coverage of certain welds at the Dresden Nuclear Power Station, Units 2 and 3 (DNPS) for the fifth inservice inspection (ISI) interval. Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(g)(5)(iii), the licensee requested relief due to the impracticality of satisfying the requirements of the

American Society of Mechanical Engineers Boiler & Pressure Vessel Code (ASME Code), Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," because of the DNPS plant design.

The NRC staff requests the response to the following request for additional information (RAI) to complete its review of relief request I5R-22.

Regulatory Basis

Adherence to Section XI of the ASME Code is mandated by 10 CFR 50.55a(g)(4), which states, in part, that ASME Code Class 1, 2, and 3 components will meet the requirements, except the design and access provisions and the pre-service examination requirements, set forth in the ASME Code, Section XI.

Inservice Inspection (ISI) of ASME Code Class 1, 2, and 3 components is to be performed in accordance with Section XI of the ASME Code and applicable edition and addenda as required by 10 CFR Section 50.55a(g), except where specific relief has been granted by the U.S. Nuclear Regulatory Commission (NRC or the Commission) pursuant to 10 CFR 50.55a(g)(6)(i). 10 CFR 50.55a(g)(5)(iii) states in part that licensees may determine that conformance with certain code requirements is impractical and that the licensee shall notify the Commission and submit information in support of the determination.

RAI 1

Issue

The licensee reported recordable indications in the Examination Category B-K welds at DNPS. Table A in the Attachment to the submittal states that five recordable rounded indications in component ID "2/1/1506-16/M-1164D-296 (IWA)" at DNPS Unit 2 were detected. Similarly, Table B in the Attachment to the submittal states that two recordable rounded indications in component ID "3/1/RPV SHELL/M-1211D-1 (IWA)" at DNPS Unit 3 were detected. The acceptance standards for these indications are in IWB-3516 per Table IWB-2500-1 of ASME Code, Section XI for Examination Category B-K. The associated enclosures did not provide sufficient information on the disposition of these recordable indications.

Request

Clarify how the recordable indications in component IDs "2/1/1506-16/M-1164D-296 (IWA)" and "3/1/RPV SHELL/M-1211D-1 (IWA)" were dispositioned per the acceptance standards in IWB-3516 of ASME Code, Section XI.

RAI 2

Issue

The staff needs clarity on the recordable indications detected in component IDs "3/1/RPV SHELL/3-SC3C-VERT" and "3/1/RPV SHELL/3-SC4B-VERT" at DNPS Unit 3, as reported in Table B in the Attachment to the submittal.

Request

Clarify whether the indications detected in component IDs “3/1/RPV SHELL/3-SC3C-VERT” and “3/1/RPV SHELL/3-SC4B-VERT” at DNPS Unit 3 are fabrication flaws and whether they were the same indications detected in the previous (fourth) ISI interval.

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