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April 3, 2024
BW240017

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

Subject: Notification of Deviation from Pressurized Water Reactor Owners Group (PWROG) Report, WCAP-17451-P, Revision 2, "Reactor Internals Guide Tube Wear – Westinghouse Domestic Fleet Operational Projections"

In accordance with Appendix B, Section 8.1.c of Nuclear Energy Institute (NEI) 03-08, "Guideline for the Management of Materials Issues," Revision 4, Constellation Energy Generation, LLC (CEG) is notifying the U.S. Nuclear Regulatory Commission (NRC) that Braidwood Station, Units 1 and 2 have processed a deviation from a "Needed" requirement in PWROG Report, WCAP-17451-P, Revision 2, "Reactor Internals Guide Tube Wear – Westinghouse Domestic Fleet Operational Projections," with appropriate justification and documentation.

The NEI 03-08 "Needed" requirements are identified in WCAP-17451-P Revision 2, Section 6.0. As such, WCAP-17451-P, Revision 2, Table 5-14 and Section 5.4 specify that the baseline Control Rod Guide Tube (CRGT) Guide Card Wear Measurements (GCWM) for Braidwood Units 1 and 2 should take place prior to 32.8 and 33.5 Effective Full Power Years (EFPY), respectively.

Per NEI 03-08, "Needed" requirements or guidance are "to be implemented whenever possible but alternative approaches are acceptable." The deviation has been documented in accordance with CEG's corrective action program and approved by the appropriate levels of CEG management. Attachments 1 and 2 provide the deviation form and the technical justification, respectively.

In accordance with NEI 03-08, this letter is being transmitted for information only. CEG is not requesting any action from the NRC.

This letter contains no new regulatory commitments.

Please direct any questions you may have regarding this letter to Mr. Dane Brunswick, Regulatory Assurance Manager, at (779) 231-6246.

Respectfully,

Schuerman, Adam G Digitally signed by Schuerman,
Adam G
Date: 2024.04.03 08:49:07 -05'00'

Adam Schuerman
Site Vice President
Braidwood Station

Attachment 1: ER-AA-4003 Attachment 2 – NEI 03-08 Deviation Form for Control Rod Guide Tube
Guide Card Wear Measurements for Braidwood Units 1 and 2

Attachment 2: EC 640658, Revision 0, Technical Evaluation for NEI 03-08 Deviation of Control Rod
Guide Tube Guide Card Wear Measurements for Braidwood Units 1 and 2

cc: NRC Regional Administrator, Region III
NRC Senior Resident Inspector – Braidwood Station
NRC Project Manager, NRR – Braidwood and Byron Stations
Illinois Emergency Management Agency – Division of Nuclear Safety