

## Brent Ballard

---

**From:** Brent Ballard  
**Sent:** Friday, August 15, 2025 9:26 AM  
**To:** christian.williams@constellation.com; Moore, Dennis M: (Constellation Nuclear)  
**Cc:** Justin Poole; Ilka Berrios  
**Subject:** Crane Clean Energy Center - Final RAI for Request to Use Subsequent Edition of the ASME BPV Code (EPID L-2025-LLR-0040)  
**Attachments:** RAI-10701-R1-FINAL.docx

Good morning, Christian and Dennis,

By letter dated March 31, 2025 (Agencywide Documents Access Management System (ADAMS) Accession No. ML25090A036), Constellation Energy Generation, LLC, (CEG, the licensee) submitted a request to use a subsequent edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPV), Section XI, for the Christopher M. Crane Clean Energy Center (CCEC; Three Mile Island Nuclear Station, Unit 1 at the time of submittal). Specifically, CEG requested to use the 2013 Edition of the ASME BPV Code for performing non-destructive examination and repair and replacement activities for Section XI related activities at the CCEC.

The NRC staff has determined that additional information is needed to complete its review. Attached is NRC staff's request for additional information (RAI).

Clarification calls were held August 4, 2025, and August 15, 2025, with CEG. No changes were made to the RAI following the August 15, 2025, call. The NRC staff is requesting a response to the RAI within 30 days of the date of this email, which is September 15, 2025. Please let me know if you have any questions.

Thank you,  
Brent

Brent Ballard  
Project Manager  
Plant Licensing Branch III  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
301-415-0680

**REQUEST FOR ADDITIONAL INFORMATION**  
**BY THE OFFICE OF NUCLEAR REACTOR REGULATION**  
REQUEST TO USE 2013 EDITION OF ASME BPV CODE, SECTION XI  
FOR NDE AND R&R ACTIVITIES  
CONSTELLATION ENERGY GENERATION, LLC  
CHRISTOPHER M. CRANE CLEAN ENERGY CENTER  
DOCKET NO. 05000289  
ISSUE DATE: AUGUST 15, 2025

## **Background**

By letter dated March 31, 2025, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML25090A036) Constellation Energy Generation, LLC (CEG, the licensee) requested NRC approval to use a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code, Section XI, for the inservice inspection (ISI) program in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(g)(4)(iv) for the planned restart of the Christopher M. Crane Clean Energy Center (CCEC) following permanent cessation of power operations. Specifically, the licensee requests to update the CCEC ISI program for the 4<sup>th</sup> interval to the 2013 Edition of the ASME Code for performing Non-Destructive Examination (NDE) and Repair and Replacement (R&R) for ASME BPV Section XI related activities. The licensee's letter also stated:

In the regulatory path letter (Reference 2 [ML24310A104]), CEG stated that it will ensure that all necessary codes and standards, including 10 CFR 50.55a(g) related to ASME In-service Inspection (ISI), are met or appropriate relief is obtained per the defined regulatory process. As such, this request is being submitted for NRC approval in accordance with 10 CFR 50.55a(g)(4)(iv).

The NRC staff requests the following information to complete its review in accordance with 10 CFR 50.55a(g)(4)(iv).

## **Regulatory Basis**

The regulations at 10 CFR 50.55a(g)(4)(iv), *Applicable ISI Code: Use of subsequent Code editions and addenda*," 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. NRC approval is not required when updating the ISI code of record before the start of an ISI interval in which the updated ISI code of record will be used and when using the latest edition incorporated by reference in (a)(1)(iv) of this section in its entirety, subject to the conditions listed in paragraph (b) of this section (or the optional ASME Code Cases listed in NRC Regulatory Guide 1.147 or NRC Regulatory Guide 1.192 as incorporated by reference in paragraphs (a)(3)(ii) and (iii) of this section, respectively).

## Question 1

- a. The request states that the duration is for the remainder of the 4<sup>th</sup> ISI interval. Provide the duration of the proposed extended 4<sup>th</sup> interval (start and end time) that would be requested for approval (e.g., from April 2011 up to fuel load, restart, etc.).
- b. Provide the time period for when the 5<sup>th</sup> ISI interval will begin, which this request would no longer be in effect.
- c. The NRC staff notes that the 4<sup>th</sup> ISI interval was scheduled to end in 2022, and there is no documentation on whether the ISI Program and Plan exists or has been maintained in accordance with 10 CFR 50.55a during the decommissioning period that began in 2019.
  - i. Therefore, based on the above, provide what ISI Program will be used for this request, and whether the ISI Program records are still applicable and meet ASME Code requirements, and whether it is available for inspection.
  - ii. In addition, provide the period of the 4<sup>th</sup> interval in accordance with Section XI of the ASME Code that this request applies to (e.g., all inspections from the 3<sup>rd</sup> period of the 4<sup>th</sup> interval).
  - iii. Also, specify if there is still a Repair/Replacement Program and Plan established that meets the requirements of IWA-4140 and IWA-4150 of Section XI of the ASME Code that will be used for this request, and whether it is available for inspection.
- d. Confirm that NDE and Repair/replacement activities to be performed during the remaining 4<sup>th</sup> ISI interval will use the following Editions of Section XI of the ASME Code, per Table 1 of the request, for these applicable paragraphs:
  - i. IWB-2420 (Successive Inspections), IWB-2430 (Additional Examinations) to the 2004 Edition; and IWB-3123 (Repair/Replacement Activity and Reexamination), IWB-3132 (Acceptance), IWB-3142 (Acceptance) to the 2013 Edition,
  - ii. IWC-2420 (Successive Inspections), IWC-2430 (Additional Examinations), IWC-3122 (Acceptance), IWC-3124 (Repair/Replacement Activity and Reexamination), IWC-3130 (Inservice Visual Examinations), IWC-3200 (Supplemental Examinations) to the 2004 Edition,
  - iii. IWD-2420 (Successive Inspections), IWD-2430 (Additional Examinations), IWD-3120 (Inservice Examinations), IWD-3200 (Supplemental Examinations) to the 2004 Edition,
  - iv. IWE-2420 (Successive Inspections), IWE-3122 (Acceptance), IWE-3500 (Acceptance Standards) to the 2004 Edition,
  - v. IWF-2420 (Successive Inspections), IWF-2430 (Additional Examinations), IWF-3112 (Acceptance), IWF-3200 (Supplemental Examinations) to the 2004 Edition.