Beaver Valley Power Station
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L-26-132
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10 CFR 50.55a(z)(1)

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject:
Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66
Request to Extend Certain Reactor Vessel Inspections From 20 to 22 Years (Request 1-TYP-4-BA-02, Rev. 0)

In accordance with the provisions of 10 CFR 50.55a(z), Vistra Operations Company LLC (Vistra OpCo) hereby requests Nuclear Regulatory Commission (NRC) approval of a proposed alternative to American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME BPV Code), Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," Paragraph IWB-2411, "Inspection Program," and Table IWB-2500-1, "Examination Categories," at Beaver Valley Power Station, Unit No. 1 (BVPS-1).

ASME BPV Code, Section XI, Paragraph IWB-2411 requires volumetric examination of essentially 100 percent of reactor vessel pressure-retaining Examination Category B-A and B-D welds identified in Table IWB-2500-1 be performed once each 10-year interval.

The proposed alternative would extend the inservice inspection interval from 20 years to 22 years for certain reactor vessel welds. A more detailed description of the proposed alternative and supporting information is presented in the attachment.

Vistra OpCo requests approval of the proposed alternative by January 8, 2027.

There are no regulatory commitments contained in this submittal. If there are any questions, or if additional information is required, please contact Jack Hicks, Senior Manager, Licensing, at (254) 897-6725 or jack.hicks@vistracorp.com.

Sincerely,

Robert Kristophel

Attachment:
Beaver Valley Power Station, Unit No. 1, 10 CFR 50.55a Request 1-TYP-4-BA-02, Rev. 0

cc: NRC Region I Administrator
NRC Resident Inspector
NRC Project Manager
Director BRP/DEP
Site BRP/DEP Representative

Beaver Valley Power Station, Unit No. 1
10 CFR 50.55a Request 1-TYP-4-BA-02, Rev.0

Proposed Alternative
In Accordance with 10 CFR 50.55a(z)(1)
-Alternative Provides Acceptable Level of Quality and Safety-

1. ASME Code Component(s) Affected

The affected component is the Beaver Valley Unit 1 reactor vessel (RV), specifically, the following American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code, Section XI (Reference 1) examination categories and item numbers covering examinations of the RV. These examination categories and item numbers are from IWB-2500 and Table IWB-2500-1 of the ASME BPV Code, Section XI.

Category B-A welds are defined as "Pressure Retaining Welds in Reactor Vessel."
Category B-D welds are defined as "Full Penetration Welded Nozzles in Vessels."

Examination Category	Item No.	Description
B-A	B1.10	Shell Welds
B-A	B1.11	Circumferential Shell Welds
B-A	B1.12	Longitudinal Shell Welds
B-A	B1.20	Head Welds
B-A	B1.21	Circumferential Head Welds
B-A	B1.22	Meridional Head Welds
B-A	B1.30	Shell-to-Flange Weld
B-D	B3.90	Nozzle-to-Vessel Welds
B-D	B3.100	Nozzle Inside Radius Section

(Throughout this request, the above examination categories are referred to as "the subject examinations" and the ASME BPV Code, Section XI, is referred to as "the Code.")

2. Applicable Code Edition and Addenda

ASME Code Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," 2013 Edition (Reference 1).

3. Applicable Code Requirement

IWB-2411, Inspection Program, requires volumetric examination of essentially 100% of reactor vessel pressure-retaining welds identified in Table IWB-2500-1 once each 10-year interval. The fourth inservice inspection (ISI) interval for Beaver Valley Unit 1 was originally scheduled to end August 28, 2018. In accordance with Reference 2, the fourth ISI interval was extended to August 28, 2028, aligning with the end of the fifth ISI interval. The applicable code for the next ISI interval will be selected in accordance with the requirements of 10CFR50.55a.

4. Reason for Request

The fourth ISI interval for Beaver Valley Unit 1 was originally scheduled to end August 28, 2018. An alternative was granted from the requirement of the IWB-2411 Inspection Program, that volumetric examination of essentially 100% of reactor vessel pressure-retaining Examination Category B-A and B-D welds be performed once each 10-year interval per Reference 2. In accordance with Reference 2, the fourth ISI interval was extended to August 28, 2028, aligning with the end of the fifth ISI interval. As a result, the interval between examinations of Category B-A and B-D welds was extended from 10 years to 20 years. The ASME Code required volumetric examinations of the reactor vessel full penetration pressure-retaining Examination Category B-A and B-D reactor vessel welds are currently scheduled for the Spring 2027 outage. Extending the examination interval for BVPS-1's Category B-A and B-D reactor vessel welds from 20 to 22 years will facilitate more efficient outage schedules. This includes minimizing core barrel movements, reduction in outage duration, man-rem exposure, and examination costs.

5. Proposed Alternative and Basis for Use

Vistra Corporation proposes not to perform the ASME Code required volumetric examination of the Beaver Valley Unit 1 reactor vessel full penetration pressure-retaining Examination Category B-A and B-D welds currently scheduled for Spring 2027. Vistra Corporation will perform the fourth ASME Code required volumetric examination of the Beaver Valley Unit 1 reactor vessel full penetration pressure-retaining Examination Category B-A and B-D welds no later than Spring 2030. The proposed inspection date is a deviation from the latest revised implementation plan, OG-10-238 (Reference 3), since the implementation plan reflects the next inspection being performed in 2027 for Beaver Valley Unit 1. The impact to the implementation plan in OG-10-238 would increase the number of inspections in 2030 (from five to six) and decrease the number of inspections in 2027 (from seven to six). Based on Figure 3 and Figure 4 of OG-10-238, this proposed inspection schedule change will not have a significant impact on the future inspection plan in OG-10-238 and provides a sufficient number of inspections each year to ensure adequate detection of degradation.

In accordance with 10 CFR 50.55a(z)(1), an alternate inspection interval is requested on the basis that the current interval can be revised with negligible change in risk by satisfying the risk criteria specified in Regulatory Guide 1.174 (Reference 4).

The methodology used to conduct this analysis is based on that defined in the study WCAP-16168-NP-A, Revision 3, "Risk-Informed Extension of the Reactor Vessel In-service Inspection Interval" (Reference 5). This study focuses on risk assessments of materials within the beltline and extended beltline regions of the RV wall. The results of the calculations for Beaver Valley Unit 1 were compared to those obtained from the Westinghouse pilot plant evaluated in WCAP-16168-NP-A, Revision 3. Appendix A of the WCAP identifies the parameters to be compared. Demonstrating that the parameters for Beaver Valley Unit 1 are bounded by the results of the Westinghouse pilot plant qualifies Beaver Valley Unit 1 for an ISI interval extension.

The fourth 10-year ISI interval for Beaver Valley Unit 1 reactor vessel full penetration pressure-retaining Examination Category B-A and B-D welds was originally scheduled to end on August 28, 2018. Following approval of a 10-year extension (Reference 2), the interval end date for Category B-A and B-D welds was revised from August 28, 2018 to August 28, 2028. Vistra Corporation requests to extend the fourth ISI interval end date to August 28, 2030, resulting in a 22-year inspection interval for the Category B-A and B-D welds. This alternative is justified based on the risk assessment performed in WCAP-16168-NP-A,

Revision 3 (Reference 5), Section 3.3 for the Westinghouse pilot plant. Based on the results in Table 4-1 of Reference 5, it was demonstrated that the contribution of eliminating future inspections after the initial 10-year ISI meets the prescribed regulatory criteria for assessing risk (i.e., change in core damage frequency [CDF] and large early release frequency [LERF] $< 1 \times 10^{-7}$ per reactor year per page 4-6 of Reference 5). The additional extension of the interval between examinations of Category B-A and B-D welds from 20 years to 22 years provides sufficient margin based on the conclusions from WCAP-16168-NP-A, Revision 3.

In addition to the margin inherent in the risk assessment documented in WCAP-16168-NP-A, Revision 3 (i.e., eliminating future inspections after the initial 10-year ISI meeting the prescribed regulatory criteria for assessing risk), additional margin is demonstrated as described below.

The neutron fluences at 60 EFPY were evaluated in Table 3 and conservatively bound the requested interval extension through the proposed end date of August 28, 2030. As shown in Table 1, the calculated through-wall cracking frequency (TWCF) for Beaver Valley Unit 1 is approximately an order of magnitude lower than the Westinghouse pilot plant TWCF of 1.76E-08 events per year reported in WCAP-16168-NP-A, Revision 3.

In addition, the Category B-A and B-D ultrasonic examinations of the reactor vessel welds have been performed three times at Beaver Valley Unit 1. There were eleven subsurface indications identified in the beltline and extended beltline regions during the most recently completed inservice inspection. Note that the previous ISI interval extension alternative (Reference 2) only considered the beltline region, defined as the region immediately adjacent to the reactor core, and therefore had only identified seven indications. The alternative herein for further ISI interval extension now also considers the extended beltline, defined as the region of materials that meet or exceed a neutron fluence exposure of 1.0×10^{17} n/cm^2 ($E > 1.0$ MeV), resulting in a total of eleven indications. All identified indications were acceptable per Table IWB-3510-1 of Section XI of the ASME Code. There were no indications within the inner 1/10th or inner 1" of the reactor vessel wall thickness. Accordingly, significant margin exists relative to the allowable flaw density requirements in the Alternate Pressurized Thermal Shock Rule (10 CFR 50.61a).

Table 1 below lists the critical parameters investigated in the WCAP and compares the results of the Westinghouse pilot plant to those of Beaver Valley Unit 1. Tables 2 and 3 provide additional information that was requested by the NRC and included in Appendix A of Reference 5.

Table 1: Critical Parameters for the Application of Bounding Analysis for Beaver Valley Unit 1

Parameter	Pilot Plant Basis	Plant-Specific Basis	Additional Evaluation Required?
Dominant Pressurized Thermal Shock (PTS) Transients in the NRC PTS Risk Study are Applicable	NRC PTS Risk Study (Reference 6)	PTS Generalization Study (Reference 7)	No
Through-Wall Cracking Frequency (TWCF)	1.76E-08 Events per year (Reference 5)	2.20E-09 Events per year (Calculated per Reference 5)	No
Frequency and Severity of Design Basis Transients	7 heatup/cooldown cycles per year (Reference 5)	Bounded by 7 heatup/cooldown cycles per year	No
Cladding Layers (Single/Multiple)	Single Layer (Reference 5)	Single Layer	No

Table 2 below provides a summary of the latest reactor vessel inspection for Beaver Valley Unit 1 and an evaluation of the recorded indications. This information confirms that satisfactory examinations have been performed on the Beaver Valley Unit 1 reactor vessel.

Table 2: Additional Information Pertaining to Reactor Vessel Inspection for Beaver Valley Unit 1	
Inspection methodology:	The latest RV ISI for Beaver Valley Unit 1 was conducted in accordance with the requirements of Appendix VIII of the ASME Code, Section XI, 1989 Edition with no Addenda as modified by 10CFR 50.55a(b)(2)(xiv, xv, and xvi). Evaluation of recordable indications was performed to the acceptance standards of Section XI, 1989 Edition with no Addenda. Future inservice inspections will be performed to ASME Section XI, Appendix VIII requirements.
Number of past inspections:	Three 10-Year inservice inspections have been performed.
Number of indications found:	There were seven indications identified in the beltline region and four indications identified in the extended beltline regions during the most recently completed inservice inspection. These subsurface indications are located in the upper to intermediate shell circumferential weld seam (Item 6 in Table 3), the intermediate to lower shell circumferential weld seam (Item 8 in Table 3), and the longitudinal weld seams in the intermediate and lower shell (Items 7 and 9 in Table 3). All eleven indications are acceptable per Table IWB-3510-1 of Section XI of the ASME Code. The indications are not within the inner $1/10^{th}$ or inner 1" of the reactor vessel wall thickness; therefore, the indications are all inherently acceptable per the requirements of the Alternate PTS Rule, 10 CFR 50.61a (Reference 8).
Proposed inspection schedule for balance of plant life:	The fourth inservice inspection is scheduled for Spring 2027. This inspection will instead be performed in Spring 2030. The proposed inspection date is a deviation from the latest revised implementation plan, OG-10-238 (Reference 3), since the implementation plan reflects the next inspection being performed in 2027 for Beaver Valley Unit 1. The impact to the latest revised implementation plan OG-10-238 would increase the number of inspections in 2030 from five to six and decrease the number of inspections in 2027 from seven to six (see Figure 3 and Figure 4 of OG-10-238). Thus, this proposed inspection schedule change will not have a significant impact on the future inspection plan in OG-10-238 and provides a sufficient number of inspections each year to ensure adequate detection of degradation.

Table 3 summarizes the inputs and outputs for the calculation of through-wall cracking frequency (TWCF).

Table 3: Details of TWCF Calculation for Beaver Valley Unit 1 at 60 Effective Full Power Years (EFPY)								
Inputs (1) (2)								
							Inter. & Lower Shell T_{wall} [inches]:	8.03125
							Upper Shell T_{wall} [inches]:	9.15625
No.	**Region and Component Description**	**Material Heat No. Identification**	**Copper [weight %]**	**Nickel [weight %]**	**R.G. 1.99 Position**	**Chemistry Factor [ºF]**	**$RT_{NDT(u)}$ [ºF]**	**Fluence [Neutron/cm², E > 1.0 MeV]**
1	Upper Shell Forging B6604	123V339VA1	0.12	0.68	1.1	84.2	40	6.90E+18
2	Intermediate Shell Plate B6607-1	C4381-1	0.14	0.62	1.1	100.5	26.8	7.28E+19
3	Intermediate Shell Plate B6607-2	C4381-2	0.14	0.62	1.1	100.5	53.6	
4	Lower Shell Plate B6903-1	C6317-1	0.21	0.54	1.1	147.2	13.1	
5	Lower Shell Plate B7203-2	C6293-2	0.14	0.57	1.1	98.7	0.4	
6	Upper to Intermediate Circ. Weld 10-714	305414 (3951 & 3958)	0.34	0.61	2.1	216.9	-56	6.90E+18
		AOFJ	0.03	0.93	1.1	41.0	10	
		FOIJ	0.03	0.94	1.1	41.0	10	
		EODJ	0.02	1.04	1.1	27.0	10	
		HOCJ	0.02	0.93	1.1	27.0	10	
7	Inter. Shell Long. Weld 19-714 A&B	305424	0.28	0.63	1.1	191.7	-56	1.38E+19
8	Intermediate to Lower Circ. Weld 11-714	90136	0.27	0.07	1.1	124.3	-56	7.28E+19
9	Lower Shell Long. Weld 20-714 A&B	305414	0.34	0.61	2.1	216.9	-56	1.39E+19

Table 3: Details of TWCF Calculation for Beaver Valley Unit 1 at 60 Effective Full Power Years (EFPY)

Outputs

Methodology Used to Calculate ΔT_{30}: Regulatory Guide 1.99, Revision 2 (Reference 9)

	Controlling Material Region No.	**α_{XX}**	**RT_{MAX-XX} [°R]**	**Fluence [Neutron/cm^2, E >1.0 MeV]**	**FF (Fluence Factor)**	**ΔT_{30} [°F]**	**$TWCF_{95-XX}$**
Limiting Axial Weld - AW	9	2.4076	640.40	1.39E+19	1.0914	236.73	1.125E-10
Limiting Plate - PL	4	2.1158	689.03	7.28E+19	1.4692	216.26	9.072E-10
Limiting Forging - FO	1	2.5000	575.11	6.90E+18	0.8959	75.44	2.431E-13
Limiting Circumferential Weld - CW	4	2.1158	689.03	7.28E+19	1.4692	216.26	5.858E-12
$TWCF_{95-TOTAL} = (\alpha_{AW}TWCF_{95-AW} + \alpha_{PL}TWCF_{95-PL} + \alpha_{FO}TWCF_{95-FO} + \alpha_{CW}TWCF_{95-CW})$:							**2.20E-09**

Notes:

(1) Material properties and fluence inputs are based on WCAP-18102-NP (Reference 10) and WCAP-18738-NP (Reference 11).

(2) Neutron fluence exposure at 60 EFPY for the inlet nozzle-to-shell weld is projected to be slightly above 1.0 x 10^{17} n/cm^2 (E > 1.0 MeV). However, the nozzle-to-shell welds were determined to be less limiting than the beltline regions of the reactor vessel in the RAI responses in Appendix N of WCAP-16168-NP-A (Reference 5) and in the evaluation report for Oconee (Reference 12). Therefore, the Beaver Valley Unit 1 nozzle-to-shell welds are not the components that will yield the limiting RT_{MAX-XX} and $TWCF_{95-XX}$ values and were not evaluated for TWCF.

6. Duration of Proposed Alternative

This request is applicable to the Beaver Valley Unit 1 inservice inspection program for the fifth and sixth inspection intervals.

7. Precedents

- "Surry Power Station Units 1 and 2 – Relief Implementing Extended Reactor Vessel Inspection Interval (TAC Nos. ME8573 and ME8574)," dated April 30, 2013, ADAMS Accession Number ML13106A140.
- "Vogtle Electric Generating Plant, Units 1 and 2 – Request for Alternatives VEGP-ISI-ALT-05 and VEGP-ISI-ALT-06 (TAC Nos. MF2596 and MF2597)," dated March 20, 2014, ADAMS Accession Number ML14030A570.
- "Catawba Nuclear Station Units 1 and 2: Proposed Relief Request 13-CN-003, Request for Alternative to the Requirement of IWB-2500, Table IWB-2500-1, Category B-A and Category B-D for Reactor Pressure Vessel Welds (TAC Nos. MF1922 and MF1923)," dated March 26, 2014, ADAMS Accession Number ML14079A546.
- "Sequoyah Nuclear Plant, Units 1 and 2 – Requests for Alternatives 13-ISI-1 and 13-ISI-2 to Extend the Reactor Vessel Weld Inservice Inspection Interval (TAC Nos. MF2900 and MF2901)," dated August 1, 2014, ADAMS Accession Number ML14188B920.
- "Byron Station, Unit No. 1 – Relief from Requirements of the ASME Code to Extend the Reactor Vessel Inservice Inspection Interval (TAC No. MF3596)," dated December 10, 2014, ADAMS Accession Number ML14303A506.
- "Wolf Creek Generating Station – Request for Relief Nos. I3R-08 and I3R-09 for the Third 10-Year Inservice Inspection Program Interval (TAC Nos. MF3321 and MF3322)," dated December 10, 2014, ADAMS Accession Number ML14321A864.
- "Callaway Plant, Unit 1 – Request for Relief I3R-17, Alternative to ASME Code Requirements Which Extends the Reactor Vessel Inspection Interval from 10 to 20 Years (TAC No. MF3876)," dated February 10, 2015, ADAMS Accession Number ML15035A148.
- "Beaver Valley Power Station, Unit 2 – Relief from the Requirements of the ASME Code (CAC Nos. MF7212 and MF7217)," dated December 27, 2016, ADAMS Accession Number ML16190A133.
- "Braidwood Station, Units 1 and 2 – Request for Relief from the Requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) (CAC Nos. MF8191 and MF8192)," dated March 15, 2017, ADAMS Accession Number ML17054C255.
- "South Texas Project, Units 1 and 2 – Relief from the Requirements of the ASME Code Regarding the Third 10-Year Inservice Inspection Program Interval (EPID L-2018-LLR-0010)," dated July 24, 2018, ADAMS Accession Number ML18177A425.
- "Donald C. Cook Nuclear Plant, Unit No. 1 – Approval of Alternative to the ASME Code Regarding Reactor Vessel Weld Examination – Relief Request ISIR-4-08 (EPID: L-2018-LLR-0106)," dated October 26, 2018, ADAMS Accession Number ML18284A310.
- "R. E. Ginna Nuclear Power Plant – Issuance of Relief Request ISI-18 Regarding Fifth 10-year Inservice Inspection Program Interval (EPID L-2018-LLR-0104)," dated April 22, 2019, ADAMS Accession Number ML19100A004.
- "Point Beach Nuclear Plant, Units 1 and 2 – Approval of Relief Requests 1-RR-13 and 2-RR-13 Regarding Extension of Inspection Interval for Reactor Pressure Welds from 10 to 20 years (EPID L-2019-LLR-0060)," dated March 4, 2020, ADAMS Accession Number ML20036F261.

- "St. Lucie Plant, Unit 2 – Authorization of RR#15 Regarding Extension of ASME Requirements Related to Reactor Pressure Vessel Weld Examinations from 10 to 20 Years (EPID L-2020-LLR-0283)," dated September 30, 2021, ADAMS Accession Number ML21236A131.
- "Oconee Nuclear Station, Units 1, 2, and 3 – Authorization and Safety Evaluation for Alternative Reactor Pressure Vessel Inservice Inspection Intervals (EPID L-2021-LLR-0004)," dated November 19, 2021, ADAMS Accession Number ML21281A141.
- "Turkey Point Nuclear Generating Unit Nos. 3 and 4 – Authorization of Relief Request Nos. 8 and 9 Regarding Extension of Inspection Interval for Reactor Pressure Vessel Welds (EPID L-2021-LLR-0038)," dated May 10, 2022, ADAMS Accession Number ML22123A192.
- "Diablo Canyon Nuclear Power Plant, Unit 2 – Authorization of Relief Request for Alternative NDE-U2-RPV-20-YEAR (EPID L-2025-LLR-0055)," dated August 21, 2025, ADAMS Accession Number ML25226A157.

8. References

1. ASME Boiler and Pressure Vessel Code, Section XI, 2013 Edition, American Society of Mechanical Engineers, New York.
2. "Beaver Valley Power Station, Unit No. 1 – Safety Evaluation of Proposed Alternatives 1-TYP-4-BA-01 and 1-TYP-4-BN-01 Regarding the Fourth 10-Year Interval of the Inservice Inspection Program (EPIDS L-2017-LLR-0131 and L-2017-LLR-0137)," dated March 28, 2018, ADAMS Accession Number ML18073A106.
3. PWROG Letter OG-10-238, "Revision to the Revised Plan for Plant Specific Implementation of Extended Inservice Inspection Interval per WCAP-16168-NP, Revision 1, "Risk-Informed Extension of the Reactor Vessel In-Service Inspection Interval." PA-MSC-0120," July 12, 2010 (ADAMS Accession Number ML11153A033).
4. NRC Regulatory Guide 1.174, Revision 1, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," U.S. Nuclear Regulatory Commission, November 2002 (ADAMS Accession Number ML023240437).
5. Westinghouse Report, WCAP-16168-NP-A, Revision 3, "Risk-Informed Extension of the Reactor Vessel In-service Inspection Interval," October 2011 (ADAMS Accession Number ML11306A084).
6. NUREG-1874, "Recommended Screening Limits for Pressurized Thermal Shock (PTS)," U.S. Nuclear Regulatory Commission, March 2010 (ADAMS Accession Number ML15222A848).
7. NRC Letter Report, "Generalization of Plant-Specific Pressurized Thermal Shock (PTS) Risk Results to Additional Plants," U.S. Nuclear Regulatory Commission, December 14, 2004 (ADAMS Accession Number ML042880482).
8. Code of Federal Regulations, 10 CFR Part 50.61a, "Alternate Fracture Toughness Requirements for Protection Against Pressurized Thermal Shock Events," U.S. Nuclear Regulatory Commission, Washington D.C., Federal Register, Volume 75, No. 1, dated January 4, 2010 and No. 22 with corrections to part (g) dated February 3, 2010, March 8, 2010, and November 26, 2010.
9. NRC Regulatory Guide 1.99, Revision 2, "Radiation Embrittlement of Reactor Vessel Materials," U.S. Nuclear Regulatory Commission, May 1988 (ADAMS Accession Number ML003740284).

10. Westinghouse Report, WCAP-18102-NP, Revision 2, "Beaver Valley Unit 1 Heatup and Cooldown Limit Curves for Normal Operation," March 2021.

11. Westinghouse Report, WCAP-18738-NP, Revision 0, "Ex-Vessel Neutron Dosimetry Program for Beaver Valley Unit 1 Cycles 23-27," March 2022.

12. NRC Letter Report, "Oconee Nuclear Station, Units 1, 2, and 3 – Authorization and Safety Evaluation for Alternative Reactor Pressure Vessel Inservice Inspection Intervals (EPID L-2021-LLR-0004)," U.S. Nuclear Regulatory Commission, November 19, 2021. (ADAMS Accession Number ML21281A141).