

July 13, 2026

10 CFR 50.55a

RS-26-111

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001Byron Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. STN 50-454 and STN 50-455Subject: Relief Request Associated with Utilizing ASME Code Case OMN-26 During the
Fifth Inservice Testing Code of Record Interval

In accordance with 10 CFR 50.55a, "Codes and standards," Constellation Energy Generation, LLC (CEG) requests NRC approval of the proposed RR-03 relief request for Byron Station, Units 1 and 2 (Byron) associated with the use of American Society of Mechanical Engineers (ASME) Code Case OMN-26 (2022 Edition), "Alternate Risk-Informed and Margin Based Rules for Inservice Testing of Motor Operated Valves."

The proposed alternative is associated with the Inservice Testing (IST) Code of Record Interval for Byron starting with the Fifth IST interval. The Fifth IST Code of Record Interval is required by 10 CFR 50.55a(f)(4) to comply with the requirements of the ASME Operations and Maintenance of Nuclear Power Plants (OM Code), 2022 Edition.

The Byron IST Code of Record Interval starting with the Fifth IST interval is in effect from July 1, 2026, to June 30, 2038. CEG requests approval based on the start of the Byron fall 2026 refueling outage. Therefore, CEG requests approval of the attached relief request by August 28, 2026.

There are no regulatory commitments contained in this letter.

Should you have any questions concerning this letter, please contact Kathrine Laureto at 779-231-7394.

Respectfully,

Steinman, Rebecca Lee Digitally signed by Steinman, Rebecca
Lee
Date: 2026.07.13 11:51:11 -05'00'Rebecca L. Steinman
Sr. Manager Licensing
Constellation Energy Generation, LLC

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Attachment: 10 CFR 50.55a Alternative Request to Utilize ASME Code Case OMN-26
(2022 Edition)

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Byron Station
Illinois Emergency Management Agency – Department of Nuclear Safety

ATTACHMENT

**Byron Station
NRC Docket Nos. STN 50-454 and STN 50-455
Renewed Facility Operating License Nos. NPF-37 and NPF-66**

10 CFR 50.55a Alternative Request to Utilize ASME Code Case OMN-26 (2022 Edition)

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

1.0 ASME Code Components Affected

Active safety-related motor operated valves (MOVs) in the Byron IST Program.

2.0 Applicable Code Edition and Addenda

American Society of Mechanical Engineers (ASME) OM Code, "Operations and Maintenance of Nuclear Power Plants," 2022 Edition, no Addenda.

3.0 Applicable Code Requirement

The applicable code requirements are included in ASME OM Code Mandatory Appendix III, "Preservice and Inservice Testing of Active Electric Motor-Operated Valve Assemblies in Water Cooled Reactor Nuclear Power Plants."

The following Appendix III paragraphs are affected by this proposed alternative to adopt Code Case OMN-26, "Alternate Risk-Informed and Margin Based Rules for Inservice Testing of Motor Operated Valves."

Appendix III, paragraph III-3310, Inservice Test Interval, subparagraph (c) states "The maximum inservice test interval shall not exceed 10 yr. MOV inservice tests conducted per para. III-3400 may be used to satisfy this requirement."

Appendix III, paragraph III-3700, Risk-Informed MOV Inservice Testing, states "Risk-informed MOV inservice testing that incorporates risk insights in conjunction with performance margin to establish MOV grouping, acceptance criteria, exercising requirements and testing interval may be implemented."

Appendix III, paragraph III-3721, HSSC MOVs, states "HSSC [high safety significant component] MOVs shall be tested in accordance with para. III-3300 and exercised in accordance with para. III-3600. HSSC MOVs that can be operated during plant operation shall be exercised quarterly, unless the potential increase in CDF [core damage frequency] and LERF [large early release frequency] associated with a longer exercise interval is small."

Appendix III, paragraph III-3722, LSSC MOVs, subparagraph (d) states "LSSC [low safety significant component] MOVs shall be inservice tested at least every 10 yr in accordance with para. III-3310."

4.0 Reason for Request

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (z)(1), Constellation Energy Generation, LLC (CEG) is requesting approval to adopt ASME OM Code Case OMN-26 (2022 Edition).

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Regulatory Guide (RG) 1.192, Revision 5, Section C, "Regulatory Position" states that although the tables in the RG refer to the 2022 Edition, the specific applicability for each Code Case is provided in the OM Code Case Applicability Index dated July 1, 2022 (ADAMS Accession No. ML22279A967). The currently docketed OM Code Case Applicability Index only addresses applicability to the 2020 Edition of the OM Code; therefore, usage of OMN-26 with the 2022 Edition of the Code requires prior NRC approval.

5.0 Proposed Alternative and Basis for Use

CEG proposes to implement Code Case OMN-26 (2022 Edition) at Byron on the basis that it provides an acceptable level of quality and safety in accordance with 10 CFR 50.55a, "Codes and standards," paragraph (z)(1).

OMN-26 (2020 Edition) is listed as an approved Code Case in the OM Code Case Applicability Index dated July 1, 2022. There were no changes from the 2020 Edition to the 2022 Edition of Code Case OMN-26. Therefore, OMN-26 (2022 Edition) provides an acceptable level of quality and safety.

The OM Code Case Applicability Index dated August 1, 2025 (ADAMS Accession No. ML25349A093) lists OMN-26 (2022 Edition) as an approved Code Case. However, prior NRC approval is still required because the OM Code Case Applicability Index dated August 1, 2025, is not included in Revision 5 of RG 1.192.

6.0 Duration of Proposed Alternative

The proposed alternative will be utilized during the entire IST Code of Record Interval, including the Fifth and Sixth intervals. The Fifth IST interval is in effect from July 1, 2026, to June 30, 2038.

7.0 Precedents

None