



10 CFR 50.55a

January 24, 2019

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

Calvert Cliffs Nuclear Power Plant, Units 1 and 2
Renewed Facility Operating License Nos. DPR-53 and DPR-69
NRC Docket Nos. 50-317 and 50-318

Subject: Request to Use a Provision of a Later Edition of the ASME Boiler and Pressure Vessel Code, Section XI

- References:
- 1) NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," dated July 28, 2004
 - 2) Letter from T. Tate (U.S. Nuclear Regulatory Commission) to M. Pacilio (Exelon Generation Company, LLC), Request to Use a Later Edition and Addenda of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, dated July 18, 2014 (ML14176A748)

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(4)(iv), and the guidance provided in the referenced document, Exelon Generation Company, LLC (Exelon) requests NRC approval to use a specific provision of a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, for the units identified above. Specifically, Exelon request approval to substitute the examination requirements of the 2004 Edition with the examination requirements of the 2013 Edition for Examination Categories B-L-1, B-M-1, and C-G.

Calvert Cliffs intends to implement these later code requirements for the upcoming Spring 2019 outage through the end of the current interval (June 30, 2019).

Exelon requests approval of this request by June 1, 2019. There are no regulatory commitments in this letter.

If you have any questions concerning this letter, please contact Tom Loomis at (610) 765-5510.

Respectfully,

James Barstow
Director – Licensing and Regulatory Affairs
Exelon Generation Company, LLC

U.S. Nuclear Regulatory Commission
Request to Use a Provision of a
Later Addenda of the ASME B&PV Code, Section XI
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Attachment: Request to Use a Portion of a Later Edition of the ASME B&PV
Code, Section XI

cc: USNRC Region I, Regional Administrator
USNRC Project Manager, CCNPP
USNRC Senior Resident Inspector, CCNPP
D. A. Tancabel, State of Maryland

Attachment

**Request to Use a Portion of a Later Edition of the
ASME B&PV Code, Section XI**

**Proposed Use of Subsequent ASME Code Edition and Addenda
In Accordance with 10 CFR 50.55a(g)(4)(iv)
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In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(4)(iv) and the guidance provided in Reference 1, Exelon Generation Company, LLC (Exelon) requests NRC approval to use specific provisions of a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, for the Calvert Cliffs Nuclear Power Plant, Units 1 and 2. Specifically, Exelon requests approval to substitute the examination requirements of the 2004 Edition with the 2013 Edition.

1. ASME Code Component(s) Affected:

All components subject to examination under ASME Section XI, 2004 Edition, Examination Categories B-L-1 and B-M-1 for Class 1, and C-G for Class 2.

2. Applicable Code Edition and Addenda:

<u>PLANT</u>	<u>INTERVAL</u>	<u>EDITION</u>	<u>START</u>	<u>END</u>
Calvert Cliffs Nuclear Power Plant, Units 1 and 2	Fourth	2004 Edition No Addenda	October 10, 2009	June 30, 2019

3. Proposed Subsequent Code Edition and Addenda (or Portion):

Exelon proposes to utilize portions of the ASME Section XI, 2013 Edition in lieu of the current applicable station code editions and addenda. Beginning with the 2007 Edition with the 2008 Addenda, the examination categories for pump casing and valve body welds in both Class 1 and Class 2 were removed from ASME Section XI. The affected ASME Section XI Examination Categories were B-L-1 and B-M-1 for Class 1, and C-G for Class 2.

The volumetric examinations of associated pump and valve components required under Examination Categories B-G-1 and C-D are unaffected by this request.

The surface examinations of associated pump and valve components required under Examination Categories B-K and C-C are unaffected by this request.

The visual examinations of associated pump and valve components required under Examination Categories B-G-1, B-G-2, B-L-2, and B-M-2 are unaffected by this request.

4. Related Requirements:

10 CFR 50.55a(g)(4)(iv) 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."

**Proposed Use of Subsequent ASME Code Edition and Addenda
In Accordance with 10 CFR 50.55a(g)(4)(iv)
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10 CFR 50.55a(a)(1)(ii) incorporates by reference Section XI, Division 1, of the ASME B&PV Code, 2013 Edition, as approved in Reference 2. There are no limitations or modifications in 10 CFR 50.55a(b)(2) related to Examination Categories B-L-1, B-M-1, or C-G.

5. Duration of Proposed Request:

The duration of this request will continue for the remainder of the site's current Inservice Inspection interval.

6. References:

1. NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," dated July 28, 2004
2. Federal Register, 82 FR 32934, dated July 18, 2017