



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

February 7, 2019

LICENSEE: EXELON GENERATION COMPANY, LLC

FACILITIES: BRAIDWOOD STATION, UNITS 1 AND 2; BYRON STATION, UNITS NOS. 1 AND 2; CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2; CLINTON POWER STATION, UNIT NO. 1; DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3; JAMES A. FITZPATRICK NUCLEAR POWER PLANT; LASALLE COUNTY STATION, UNITS 1 AND 2; LIMERICK GENERATING STATION, UNITS 1 AND 2; NINE MILE POINT NUCLEAR STATION, UNITS 1 AND 2; PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3; QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2; R. E. GINNA NUCLEAR POWER PLANT; AND THREE MILE ISLAND NUCLEAR STATION, UNIT 1

SUBJECT: SUMMARY OF JANUARY 23, 2019, MEETING WITH EXELON GENERATION COMPANY, LLC REGARDING A PLANNED REQUEST TO USE ASME CODE CASE N-879 (EPID L-2018-LRM-0080)

On January 23, 2019, a Category 1 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of Exelon Generation Company, LLC (Exelon, the licensee). The purpose of the meeting was to discuss Exelon's planned resubmittal of a request to use the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (ASME Code) Case N-879, "Use of Micro-Alloyed Carbon Steel Bar in Patented Mechanical Joints and Fittings, Classes 1, 2, and 3, Section III, Division 1," at its operating reactors. The meeting notice and agenda are available in Agencywide Documents Access and Management System (ADAMS) at Accession No. ML19007A095. A copy of Exelon's presentation is available in ADAMS at Accession No. ML19022A200. A list of attendees is enclosed.

Background

By application dated May 30, 2018 (ADAMS Accession No. ML18151A023), Exelon submitted a request to use ASME Code Case N-879 at its operating reactors as an alternative to the ASME Code requirements in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a, "Codes and standards." By letter dated July 10, 2018 (ADAMS Accession No. ML18186A545), the NRC staff informed Exelon that supplemental information was needed for the staff to begin its detailed technical review of the application. By letter dated July 26, 2018 (ADAMS Accession No. ML18208A345), Exelon requested to withdraw the application for the proposed alternative to use ASME Code Case N-879. By letter dated July 30, 2018, the NRC staff acknowledged the withdrawal of the application and stated, in part, that:

If Exelon decides to resubmit the request for the proposed alternative, the application must provide a plant-specific justification for the proposed alternative that includes the information the NRC requested in its July 10, 2018, letter. Future applications should be limited to a single facility. Prior to resubmitting,

Exelon should participate in a pre-application meeting with the NRC staff to discuss its planned application.

Discussion

During the January 23, 2019, public meeting, Exelon discussed the information requested in the NRC's July 10, 2018, letter. The licensee stated that its request to use Code Case N-879 would allow it to use Lokring pipe fittings. The request would be only for the material used in these pipe fittings, and not the design, fabrication, and testing of these pipe fittings. The licensee stated that it plans to use these fittings in Class 2 and 3 applications, but it is also considering their use in Class 1 applications.

The licensee identified that it is already permitted to use these fittings in certain applications. For newer plants constructed in accordance with Section III of the ASME Code, the licensee would need approval of Code Case N-879 to use the Lokring fitting material for piping larger than NPS 1. For older plants constructed in accordance with B31.1 of the ASME Code, the alternative is not needed except for certain systems that were constructed in accordance with Section III of the ASME Code. Therefore, Exelon plans to submit the request for its fleet of operating reactors.

The licensee described the conditions (e.g., temperature and pressure) where it would use the Lokring fittings. The licensee and representatives from Lokring described the design, testing, and installation of the fittings. In addition, a Lokring representative demonstrated the installation of the fittings. Although the presentation focused on the Lokring fittings, the NRC staff noted that the licensee could make a generic request to use Code Case N-879. However, the licensee would still need to provide the information presented at the meeting.

The NRC and the licensee also discussed how quality assurance for the Lokring fittings would be accomplished. Currently, the NRC staff is reviewing a proposed alternative for the Exelon fleet (ADAMS Accession No. ML18151A028) which would allow the licensee to use ASME Code Case N-878, "Alternative to QA [Quality Assurance] Program Requirements of IWA-4142, Section XI, Division 1," and Code Case N-880, "Alternative to Procurement Requirements of IWA-4143 for Small Nonstandard Welded Fittings, Section XI, Division 1." Exelon indicated that it intends to use Code Cases N-878 and N-880, if approved, for the procurement of the Lokring fittings. Exelon further described its procurement process. Based on this discussion, the NRC staff stated that the application to use Code Case N-879 would not need to discuss quality assurance.

The licensee agreed to identify the specific ASME Codes sections for each plant for which it will be requesting an alternative. The licensee also stated that it plans to resubmit as a fleet. Based on the information the licensee presented, the staff stated that a fleet submittal would be acceptable.

Public meeting feedback forms were not received. Please direct any inquiries to me at 301-415-1380, or Blake.Purnell@nrc.gov.

A handwritten signature in black ink, appearing to read 'BP', is positioned above the typed name.

Blake Purnell, Project Manager
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-456, STN 50-457,
STN 50-454, STN 50-455, 50-317,
50-318, 50-461, 50-237, 50-249,
50-333, 50-373, 50-374, 50-352,
50-353, 50-220, 50-410, 50-277,
50-278, 50-254, 50-265, 50-244,
and 50-289

Enclosure:
List of Attendees

cc: Listserv

LIST OF ATTENDEES

JANUARY 23, 2019, MEETING WITH EXELON GENERATION COMPANY, LLC

Name	Affiliation
Blake Purnell	NRC
Bob Davis	NRC
Chakrapani Basavaraju	NRC
Kamal Manoly	NRC
Raju Patel	NRC
Stewart Bailey	NRC
Robert Hsu	NRC
Kerri Kavanagh	NRC
Al Butcavage	NRC
Thomas Loomis	Exelon
Heather Malikowski	Exelon
Jacqui Graham	Exelon
Siva Jagadeesan	Exelon
Lee Friant	Exelon
Maher Kassar	Exelon
Rick Swayne	Reedy Engineering
Mark Sindelar	Lokring Technology

Enclosure

SUBJECT: SUMMARY OF JANUARY 23, 2019, MEETING WITH EXELON GENERATION COMPANY, LLC REGARDING A PLANNED REQUEST TO USE ASME CODE CASE N-879 (EPID L-2018-LRM-0080) DATED FEBRUARY 7, 2019

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JJohnston, NRR
LBurkhart, EDO
KKavanagh, NRO
RDavis, NRR
RPatel, NRO
KHsu, NRR
CBasavaraju, NRR
AButcavage, RII

ADAMS Accession No.: Meeting Notice: ML19007A095 Meeting Summary: ML19036A883

OFFICE	NRR/DORL/LPL3/PM	NRR/DORL/LPL3/LA	NRR/DORL/LPL3/BC	NRR/DORL/LPL3/PM
NAME	BPurnell	SRohrer	DWrona	BPurnell
DATE	2/6/19	2/6/19	2/7/19	2/7/19

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