

10 CFR 50.55a

RS-19-032
JAFP-19-0025

February 19, 2019

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461Dresden Nuclear Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249James A. FitzPatrick Nuclear Power Plant
Renewed Facility Operating License No. DPR-59
NRC Docket No. 50-333LaSalle County Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374Limerick Generating Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353Peach Bottom Atomic Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277 and 50-278Quad Cities Nuclear Power Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

Subject: Revision to Relief Requests Associated with the Use of the BWRVIP
Guidelines in Lieu of Specific ASME Code Requirements on Reactor Pressure
Vessel Internals and Components Inspection

References: 1) Letter from J. Poole (U.S. Nuclear Regulatory Commission) to B. Hanson
(Exelon Generation Company, LLC), "Clinton Power Station, Unit 1 - Use
of BWRVIP Guidelines in Lieu of Specific ASME Code Requirements
(CAC No. MF6115)," dated March 10, 2016 (ML16012A344)

- 2) Letter from T. Tate (U.S. Nuclear Regulatory Commission) to M. Pacilio (Exelon Generation Company, LLC), "Dresden Nuclear Power Station, Units 2 and 3 – Safety Evaluation in Support of Request for Relief Associated with the Fifth 10-Year Inservice Inspection Interval Program (TAC Nos. ME9682, ME9683, ME9684, ME9685, ME9686, ME9687, ME9688, ME9689, ME9690, ME9691, ME9692, ME9693, ME9694, ME9695, ME9696, and ME9697)," dated September 30, 2013 (ML13258A004, ML13260A585, ML13258A003)
- 3) Letter from J. Danna (U.S. Nuclear Regulatory Commission) to B. Hanson (Exelon Generation Company, LLC), "James A. FitzPatrick Nuclear Power Plant - Relief Requests I5R-02, I5R-03, and I5R-04 for Alternatives to Certain ASME Code Requirements (CAC Nos. MG0116, MG0117, and MG0118; EPID L-2017-LLR-0083, EPID L-2017-LLR-0084, and EPID L-2017-LLR-0085)," dated May 30, 2018 (ML18039A854)
- 4) Letter from D. Wrona (U.S. Nuclear Regulatory Commission) to B. Hanson (Exelon Generation Company, LLC), LaSalle County Station, Units 1 and 2, Relief from the Requirements of the ASME Code and OM Code, dated November 17, 2017 (ML17305B279)
- 5) Letter from S. Koenick (U.S. Nuclear Regulatory Commission) to B. Hanson (Exelon Generation Company, LLC), "Safety Evaluation of Relief Requests I4R-02 and I4R-10 for the Fourth 10-Year Interval of the Inservice Inspection Program for Limerick Generating Station, Units 1 and 2 (CAC Nos. MF7587 and MF7588)," dated November 21, 2016 (ML16301A401)
- 6) Letter from J. Danna (U.S. Nuclear Regulatory Commission) to B. Hanson (Exelon Generation Company, LLC), "Peach Bottom Atomic Power Station, Units 2 and 3 - Safety Evaluation of Relief Request I5R-03 Regarding the Fifth 10-Year Interval of the Inservice Inspection Program (EPID NO. L-2018-LLR-0056)," dated July 18, 2018 (ML18179A394)
- 7) Letter from T. Tate (U.S. Nuclear Regulatory Commission) to M. Pacilio (Exelon Generation Company, LLC), "Quad Cities Nuclear Power Station, Units 1 and 2 – Safety Evaluation in Support of Request for Relief Associated with the Fifth 10 Year Interval Inservice Inspection Program (TAC Nos. ME9668, ME9669, ME9670, ME9671, ME9672, ME9673, ME9674, ME9675, ME9676, ME9677, ME9678, ME9679, ME9680, ME9681)," dated September 30, 2013 (ML13267A097)

In accordance with 10 CFR 50.55a(z)(1), Exelon Generation Company, LLC (Exelon) is requesting a revision to the above referenced Safety Evaluation Reports (References 1 through 7) concerning the use of the BWRVIP Guidelines in lieu of specific ASME Code requirements on Reactor Pressure Vessel internals and components inspection.

Since the issuance of these U.S. Nuclear Regulatory Commission Safety Evaluation Reports, revisions to Boiling Water Reactor Vessel and Internals Project (BWRVIP) documents have occurred. Specifically, "BWRVIP-18, Revision 2-A: BWR Vessel and Internals Project BWR Core Spray Internals Inspection and Flaw Evaluation Guidelines," and "BWRVIP-41, Revision 4-A: BWR Vessel and Internals Project BWR Jet Pump Assembly Inspection and Flaw Evaluation Guidelines" have been approved. Exelon is requesting the previously approved U.S. Nuclear Regulatory Commission Safety Evaluation Reports be revised to include these updated documents.

There are no regulatory commitments contained in this letter. Exelon requests your review and approval of this fleet request by September 3, 2019 so that the updated BWRVIP documents can be utilized in the fall 2019 outages.

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

Respectfully,



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

Attachment: Revision to Relief Requests Associated with the Use of the BWRVIP Guidelines
in Lieu of Specific ASME Code Requirements on Reactor Pressure Vessel
Internals and Components Inspection

cc: Regional Administrator - NRC Region I
Regional Administrator - NRC Region III
NRC Senior Resident Inspector - Clinton Power Station
NRC Senior Resident Inspector - Dresden Nuclear Power Station
NRC Senior Resident Inspector - James A. FitzPatrick Nuclear Power Plant
NRC Senior Resident Inspector - LaSalle County Station
NRC Senior Resident Inspector - Limerick Generating Station
NRC Senior Resident Inspector - Peach Bottom Atomic Power Station
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station
NRC Project Manager - Clinton Power Station
NRC Project Manager - Dresden Nuclear Power Station
NRC Project Manager - James A. FitzPatrick Nuclear Power Plant
NRC Project Manager - LaSalle County Station
NRC Project Manager - Limerick Generating Station
NRC Project Manager - Peach Bottom Atomic Power Station
NRC Project Manager - Quad Cities Nuclear Power Station

Attachment

**Revision to Relief Requests Associated with the Use of the BWRVIP Guidelines in Lieu of
Specific ASME Code Requirements on Reactor Pressure Vessel Internals and
Components Inspection in Accordance with 10 CFR 50.55a(z)(1)**

10 CFR 50.55a RELIEF REQUEST

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Revision to Relief Requests Associated with the Use of the BWRVIP Guidelines in Lieu of Specific ASME Code Requirements on Reactor Pressure Vessel Internals and Components Inspection in Accordance with 10 CFR 50.55a(z)(1)

1.0 Reason for Request

Pursuant to 10 CFR 50.55a(z)(1), a revision is requested to the U.S. Nuclear Regulatory Commission previously approved relief requests (Table 1) associated with the use of the Boiling Water Reactor Vessel and Internals Project (BWRVIP) guidelines in lieu of specific ASME Code requirements on Reactor Pressure Vessel internals and components inspection. Since the issuance of these U.S. Nuclear Regulatory Commission Safety Evaluation Reports, revisions to BWRVIP documents has occurred. Specifically, BWRVIP-18, Revision 2-A (Reference 1) and BWRVIP-41, Revision 4-A (Reference 2) have been issued. Exelon is requesting approval to use the latest U.S. Nuclear Regulatory Commission approved documents in place of the document revisions cited in the Safety Evaluation Reports on the basis that these approved BWRVIP documents provide an acceptable level of quality and safety.

The BWRVIP guidelines have recommended aggressive specific inspection by BWR operators to identify material condition issues with BWR components. A wealth of inspection data has been gathered during these inspections across the BWR industry. These guidelines focus on specific and susceptible components, specify appropriate inspection methods capable of identifying anticipated degradation mechanisms, and require re-examination at conservative intervals. In contrast, the code inspection requirements were prepared before the BWRVIP initiative and have not evolved with BWR inspection experience.

2.0 Proposed Revision

The Exelon units listed in Table 1 have submitted relief requests proposing to use the BWRVIP guidelines as an alternative to the requirements of Section XI of the ASME Code for the ISI of the Reactor Pressure Vessel (RPV) interior surfaces, attachments, and core support structures. Relief requests have been approved by the NRC with specific revisions of BWRVIP documents listed. In some Safety Evaluation Reports, language is included which restricts the use of the relief request benefits to the BWRVIP document revisions specifically addressed within the relief request submittal. In the time since the staff's approval of Exelon's proposed alternatives, some BWRVIP documents have been revised by the BWRVIP and approved by the NRC. Exelon requests that the latest NRC approved revisions of the BWRVIP-18 and BWRVIP-41 be used as an alternative to the revisions currently listed in the respective Safety Evaluation Reports.

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3.0 References

1. BWRVIP-18, Revision 2-A: BWR Vessel and Internals Project BWR Core Spray Internals Inspection and Flaw Evaluation Guidelines. EPRI, Palo Alto, CA: 2016. 3002008089.
2. BWRVIP-41, Revision 4-A: BWR Vessel and Internals Project BWR Jet Pump Assembly Inspection and Flaw Evaluation Guidelines. EPRI, Palo Alto, CA: 2018. 3002014254.

Table 1
Plants with Updated BWRVIP Document Revisions

Unit	Safety Evaluation ADAMS Accession No.	Listed BWRVIP-18 Revision	Requested BWRVIP-18 Revision	Listed BWRVIP-41 Revision	Requested BWRVIP-41 Revision
Clinton Power Station, Unit 1	ML16012A344	1-A	2-A	3	4-A
Dresden Nuclear Power Station, Units 2 and 3	ML13258A004, ML13260A585, ML13258A003	1	2-A	N/A*	N/A
James A. Fitzpatrick Nuclear Power Plant	ML18039A854	1-A	2-A	3	4-A
LaSalle County Station, Units 1 and 2	ML17305B279	2-A	No Change Requested	3	4-A
Limerick Generating Station, Units 1 and 2	ML16301A401	1-A	2-A	3	4-A
Peach Bottom Atomic Power Station, Units 2 and 3	ML18179A394	2-A	No Change Requested	3	4-A
Quad Cities Nuclear Power Station, Units 1 and 2	ML13267A097	1	2-A	N/A*	N/A

*BWRVIP-41 was not included in the Dresden and Quad Cities relief requests as discussed in the associated U.S. Nuclear Regulatory Commission Safety Evaluation Reports.