

**From:** Purnell, Blake  
**Sent:** Tuesday, February 25, 2020 2:20 PM  
**To:** Neff, David B:(Exelon Nuclear)  
**Cc:** Salgado, Nancy; Rafferty-Czincila, Shannon B:(GenCo-Nuc)  
**Subject:** Exelon Generation Company, LLC - Fleet Alternative Request to Use ASME Code Case OMN-26 (EPID L-2020-LLR-0012)

Mr. Neff,

By application dated January 30, 2020 (ADAMS Accession No. ML20034C819), Exelon Generation Company, LLC (the licensee) submitted a request in accordance with Paragraph 50.55a(z)(1) of Title 10 of the *Code of Federal Regulations* (10 CFR) for a proposed alternative to the requirements of 10 CFR 50.55a and the American Society of Mechanical Engineers (ASME) Code at Braidwood Station, Units 1 and 2; Calvert Cliffs Nuclear Power Plant, Units 1 and 2; Clinton Power Station, Unit No. 1; 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; and R. E. Ginna Nuclear Power Plant. The proposed alternative would allow the licensee to use ASME Code Case OMN-26, "Alternate Risk-Informed and Margin Based Rules for Inservice Testing of Motor Operated Valves," at these facilities.

The purpose of this email is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this proposed alternative. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed your application and concluded that it provides technical information in sufficient detail to enable the staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed alternative in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review, as compared to the detailed technical review, there may be instances in which issues that impact the staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. You will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, the NRC staff estimates that review of this request will take approximately 325 hours to complete. The staff expects to complete its review by February 28, 2021. These estimates are based on the staff's initial review of the application and they could change due to several factors, including requests for additional information. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes to the forecasted hours, I will inform you of the reason for the change and provide the new estimates.

Sincerely,

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

Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
ph: 301-415-1380

Docket Nos. STN 50-456, STN 50-457, 50-461, 50-352, 50-353, 50-220, 50-410, 50-277, 50-278, and 50-244

**Hearing Identifier:** NRR\_DRMA  
**Email Number:** 453

**Mail Envelope Properties** (MN2PR09MB403018EA4815CB56FDF1AA00E6ED0)

**Subject:** Exelon Generation Company, LLC - Fleet Alternative Request to Use ASME  
Code Case OMN-26 (EPID L-2020-LLR-0012)  
**Sent Date:** 2/25/2020 2:19:52 PM  
**Received Date:** 2/25/2020 2:19:00 PM  
**From:** Purnell, Blake

**Created By:** Blake.Purnell@nrc.gov

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Tracking Status: None

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Tracking Status: None

"Neff, David B:(Exelon Nuclear)" <david.neff@exeloncorp.com>

Tracking Status: None

**Post Office:** MN2PR09MB4030.namprd09.prod.outlook.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	3197	2/25/2020 2:19:00 PM

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**Priority:** Normal

**Return Notification:** No

**Reply Requested:** No

**Sensitivity:** Normal

**Expiration Date:**