

To: Blake Purnell
Project Manager, U.S. Nuclear Regulatory Commission

CC: NRC Senior Resident Inspector - Braidwood Station
NRC Senior Resident Inspector - Byron Station
NRC Senior Resident Inspector - Calvert Cliffs Nuclear Power Plant
NRC Senior Resident Inspector - LaSalle County Station
NRC Senior Resident Inspector - Limerick Generating Station
NRC Senior Resident Inspector - Nine Mile Point Nuclear Station
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station
NRC Senior Resident Inspector - R. E. Ginna Nuclear Power Plant

Reference: NRC Letter from H. Nieh to NEI, "U.S. Nuclear Regulatory Commission Planned Actions Related to the Requirements for ASME Code Inservice Inspection Reporting During the Coronavirus Disease 2019 Public Health Emergency," dated April 9, 2020

As a result of the Coronavirus Disease 2019 (COVID-19) public health emergency (PHE), Exelon Generation Company, LLC (Exelon) requests an alternative from certain reporting requirements of ASME Boiler and Pressure Vessel (B&PV) Code, Section XI, IWA-1400, IWA-6240, and 10 CFR 50.55a(b)(2)(xxxii), as applicable, for Braidwood Station, Unit 2, Byron Station, Unit 1, Calvert Cliffs Nuclear Power Plant, Unit 1, LaSalle County Station, Unit 1, Limerick Generating Station, Unit 1, Nine Mile Point Nuclear Station, Unit 2, R. E. Ginna Nuclear Power Plant, and Quad Cities Nuclear Power Station, Unit 2. This alternative is being requested pursuant to 10 CFR 50.55a(z)(2), Hardship without a compensating increase in quality and safety. ASME B&PV Code, Section XI, IWA-1400, IWA-6240, and 10 CFR 50.55a(b)(2)(xxxii) state, in part, that inservice inspection summary reports shall be submitted to the U. S. Nuclear Regulatory Commission (NRC) within 90 calendar days of the completion of each refueling outage. IWA-6230 of the ASME B&PV Code, Section XI, which is incorporated by reference in 10 CFR 50.55a, requires licensees to complete an inservice inspection summary report within 90 days after the conclusion of a refueling outage, per Mandatory Appendix II. As an alternative to the requirements of Section XI, ASME Code Case N-532-5 allows for the use of the Owners Activity Report (OAR-1) which provides a summary of items with flaws or relevant conditions that required evaluation for continued service, and repair and replacement activities required for continued service that occurred during the previous operating cycle.

The Reference letter allows for a review of a request for a deferral of the required report, provided certain information is provided. In accordance with the Reference letter, the following information is provided:

<u>PLANT</u>	<u>CURRENT CODE EDITION OF RECORD</u>	<u>CURRENT DUE DATE OF OAR-1</u>	<u>PROPOSED ALTERNATE SUBMISSION DATE</u>
LaSalle County Stations, Unit 1	2007 Edition, through 2008 Addenda	May 28, 2020	See Schedule Below
Calvert Cliffs Nuclear Power Plant, Unit 1	2013 Edition	June 10, 2020	See Schedule Below
Byron Station, Unit 1	2007 Edition, through 2008 Addenda	June 25, 2020	See Schedule Below
Nine Mile Point Nuclear Station, Unit 2	2013 Edition	July 2, 2020	See Schedule Below
Limerick Generating Station, Unit 1	2007 Edition, through 2008 Addenda	July 12, 2020	See Schedule Below
Quad Cities Nuclear Power Station, Unit 2	2007 Edition, through 2008 Addenda and 2013 Edition	July 14, 2020	See Schedule Below
R. E. Ginna Nuclear Power Plant	2004 and 2013 Edition	Shutdown April 6, 2020 – still in refueling outage	See Schedule Below
Braidwood Station, Unit 2	2013 Edition	Estimated shutdown April 20, 2020	See Schedule Below

Exelon proposes to submit the LaSalle County Station, Unit 1 inservice inspection summary report, or approved alternative, no later than 90 days following the end of the PHE. Exelon will submit each subsequent remaining site report in approximately 30-day intervals, in order of their respective due dates, up to 300 days following the end of the PHE, but in no case later than the beginning of the subsequent refueling outage.

This staggered submittal of the reports will reduce the hardship created by the sudden lifting of the PHE that will result in an immediate demand of site engineering, maintenance, Authorized Nuclear Inservice Inspector (ANII) services, and centralized engineering resources that are necessary to prepare this administrative report. If all eight stations were required to submit their reports within 90 days following the end of the PHE, it would divert plant and centralized engineering personnel resources. Following the end of the PHE, it is expected that when personnel return to their sites, preparation of the report will be complicated with the additional normal workload that has been delayed as a result of the pandemic.

The bulk of the effort to prepare the report is associated with work order close out and review. Each work order associated with ASME Section XI work for the previous operating cycle needs to be completed, closed, reviewed, and archived by maintenance and clerical personnel. Depending on the amount of inservice activities that occur during the previous operating cycle, the report requires a range of 400 to 650 person-hours to prepare. Site programs personnel, centralized engineering, and the ANII are constantly reviewing the work along the way to ensure code compliance.

This alternative is necessary based on Exelon measures to maintain Centers for Disease Control and Prevention (CDC) recommendations related to social distancing, worker screening, and limiting close-proximity work. To implement these measures, Exelon is telecommunicating for all employees whose job responsibilities enable them to do so. Submitting this report within

90 days after the conclusion of a refueling outage would challenge Exelon's ability to maintain telecommunicating for the individuals involved with the preparation of this report; therefore, compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Exelon has established procedures to retain records of its completed inspection items that are easily accessible for NRC inspection, specifically ER-AA-330, "Conduct of Inservice Inspection Activities."

Exelon requests approval of this Alternative by Friday May 1, 2020.

Respectfully,

A handwritten signature in dark ink, appearing to read "David T. Gudger", with a stylized flourish at the end.

David T. Gudger
Sr. Manager, Licensing
Exelon Generation Company, LLC