



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

June 22, 2021

LICENSEE: EXELON GENERATION COMPANY, LLC

FACILITIES: BRAIDWOOD STATION, UNITS 1 AND 2; BYRON STATION, UNIT 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; AND R. E. GINNA NUCLEAR POWER PLANT

SUBJECT: SUMMARY OF MAY 18, 2021, MEETING WITH EXELON GENERATION COMPANY, LLC REGARDING ITS REQUESTED ALTERNATIVE TO ELIMINATE CERTAIN DOCUMENTATION REQUIREMENTS FOR THE REPLACEMENT OF PRESSURE RETAINING BOLTING (EPIDS L-2020-0153, L-2020-0154, L-2020-0155, L-2021-LLR-0029, AND L-2021-LLR-0030)

By application dated December 1, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20336A008), Exelon Generation Company, LLC (Exelon, 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 certain requirements of 10 CFR 50.55a, "Codes and standards," for the subject facilities. The proposed alternative would allow the licensee to forgo preparation and completion of a repair and replacement plan and associated Form NIS-2 (or NIS-2A) for certain pressure retaining bolting at these facilities. These documentation requirements are provided in Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code, as incorporated by reference in 10 CFR 50.55a with conditions. By letter dated April 20, 2021 (ADAMS Accession No. ML21110A092), Exelon provided supplemental information in response to the U.S. Nuclear Regulatory Commission (NRC) staff's request for additional information (RAI) issued on March 1, 2021 (ADAMS Accession No. ML21062A065).

On May 18, 2021, an observational public meeting was held between the NRC staff and Exelon representatives. The purpose of the meeting was to discuss Exelon's proposed alternative. The meeting was primarily focused on Exelon's response to RAIs 2 and 3. The meeting notice and agenda are available in ADAMS at Accession No. ML21118A701. A list of attendees is enclosed.

According to the application, as supplemented, "[t]he current Form NIS-2 (or NIS-2A) provides documented evidence of compliance with Section XI for repair/replacement activities by obtaining Owner and Authorized Inspection Agency [AIA] signatures." The application stated, in part, that the AIA reviews of completed work orders applying the proposed alternative would be documented in records associated with the work management process. In RAI 2, the NRC staff requested the licensee to describe how these processes will permit verification and certification

by the AIA that the applicable Section XI requirements for repair/replacement activities have been met. In response to RAI 2, Exelon revised its application to state: "Should the Authorized Inspection Agency choose to review certain completed work orders that fall under this relief request, the work management system will be used to document any agency comments during the work order records review."

During the public meeting, the NRC staff asked for clarification regarding Exelon's response to RAI 2. Exelon stated that review of the applicable work order records would be left to the discretion of the AIA. The process for documenting AIA reviews has not been determined and would be left to each site to develop on its own. If the AIA raised concerns, Exelon would add the concern to the corrective action program for the site. Exelon stated that AIA signature would no longer be required for the repair and replacement of applicable bolting under the proposed alternative. Exelon also stated that the AIA would sign off on the 90-day report (Owner's Activity Report provided in ASME Code Case N-532) that is submitted to the NRC. However, Exelon clarified that this report would not cover the routine repair and replacement of bolting that is the focus of the requested alternative.

The NRC staff stated that Exelon needs to provide supplemental information to explain why the AIA review and signature are not needed. In addition, the NRC staff stated that Exelon should describe how the AIA review will be documented if it chooses to review work order records under this alternative request. Exelon agreed to provide this information in a supplement to the application, but it would need time to determine the schedule for the supplement.

Exelon also noted that the AIA review of pressure testing is also at the discretion of the AIA, and its proposed alternative would be similar in that regards. The NRC staff stated that it would be helpful to include this information in the supplement to the application.

During the meeting, the NRC staff also discussed Exelon's response to RAI 3, which expanded the scope of the original application to include the sixth 10-year inservice inspection (ISI) intervals at Dresden and Quad Cities. By email dated April 26, 2021 (ADAMS Accession No. ML21117A044), the NRC staff informed Exelon that it would review the additional request to use the proposed alternative for the sixth 10-year ISI intervals at Dresden and Quad Cities separately from the original application. During the meeting, the NRC staff stated that Exelon would also need to provide a supplement to support these additional reviews to identify the specific requirements within the 2017 Edition of the ASME BPV Code, Section XI, for which Exelon sought relief. Exelon stated it would provide this supplement by May 19, 2021.

There were no public comments and no public meeting feedback forms were received. Please direct any inquiries to me at 301-415-1380 or [Blake.Purnell@nrc.gov](mailto:Blake.Purnell@nrc.gov).

*/RA/*

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, and 50-244

Enclosure:  
List of Attendees

Listserv

LIST OF ATTENDEES

MAY 18, 2021, MEETING WITH EXELON GENERATION COMPANY, LLC

<b>Name</b>	<b>Affiliation</b>
Blake Purnell	NRC
Yamir Diaz-Castillo	NRC
John Tsao	NRC
John Honcharik	NRC
Keith Hoffman	NRC
Nancy Salgado	NRC
Russell Haskell	NRC
Booma Venkataraman	NRC
Kerri Kavanagh	NRC
Jackie Harvey	NRC
Thomas Loomis	Exelon
Brendan Casey	Exelon
Mark Weis	Exelon
Dan Lamond	TruNorth
Matt Ralstin	Exelon
Josh Sarrafian	Exelon
Ben Jordan	Exelon
Robert Hoke	Exelon
Brian Huling	Exelon
Michelle Karasek	Exelon
Rick Swart	Exelon

Enclosure

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RidsNrrDrolqyb Resource  
RRichardson, EDO  
YDiazCastillo, NRR  
JTsaio, NRR  
JHoncharik, NRR  
KHoffman, NRR  
DWidrevitz, NRR  
CDeMessieres, NRR  
JHarvey, NRR

**ADAMS Accession No. ML21139A185**

OFFICE	NRR/DORL/LPL3/PM	NRR/DORL/LPL3/LA	NRR/DORL/LPL3/BC	NRR/DORL/LPL3/PM
NAME	BPurnell	SRohrer	NSalgado	BPurnell
DATE	5/24/21	5/20/21	5/25/21	6/22/21

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