

**From:** Ballard, Brent  
**Sent:** Friday, October 22, 2021 2:46 PM  
**To:** thomas.loomis@exeloncorp.com  
**Cc:** Mayer, Annie; Danna, James  
**Subject:** Acceptance for Review of Proposed Alternative ISI-05-019 for Pressure Testing of Certain Portions of ASME Section XI Class 2 Auxiliary Feedwater Piping (EPID L-2021-LLR-0080)

Good afternoon Tom,

By letter dated September 20, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21263A186), Exelon Generation Company, LLC (the licensee) requested a proposed alternative for Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2. The proposed alternative would forego inservice inspection system pressure testing and visual examination of certain portions of auxiliary feedwater piping as required by American Society of Engineers Boiler and Pressure Vessel Code, Section XI, in favor of inservice flow testing prior to each refueling outage and VT-2 visual examinations of the subject piping only during refueling outages where the secondary side of the steam generator is filled.

The purpose of this e-mail 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.

Pursuant to Section 50.55a(z)(1) of Title 10 of the Code of Federal Regulations (10 CFR), the applicant shall demonstrate that the proposed alternatives would provide an acceptable level of quality and safety.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed alternative. 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 NRC 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 NRC staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this request will take approximately 100 hours to complete. The NRC staff expects to complete this review by June 30, 2022. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager.

These estimates are based on the NRC staff's initial review of the application and they could change, due to several factors including requests for additional information and/or unanticipated addition of scope

to the review. Additional delay may occur if the submittal is provided to the NRC in advance or in parallel with industry program initiatives or pilot applications.

If you have any questions, please contact me at 301-415-0680 or by e-mail.

Docket Nos. 50-317 and 50-318

Brent Ballard  
Project Manager  
Plant Licensing Branch 1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
301-415-0680

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