



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

November 30, 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 NOVEMBER 16, 2021, MEETING WITH EXELON GENERATION COMPANY, LLC REGARDING A PLANNED REQUEST FOR AN ALTERNATIVE TO EXTEND THE INSERVICE INSPECTION INTERVAL (EPID L-2021-LRM-0103)

On November 16, 2021, an observation public meeting was held between the U.S. Nuclear Regulatory Commission (NRC or Commission) staff and representatives of Exelon Generation Company, LLC (Exelon, the licensee). The purpose of the meeting was to discuss a proposed alternative to certain requirements in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a, "Codes and standards," for the subject facilities. The meeting notice and agenda are available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML21278A103, and Exelon's meeting handout is available at ADAMS Accession No. ML21314A447. A list of attendees is enclosed. No decisions were made at this meeting. Pre-application meetings with Exelon on a similar proposal were held on November 4, 2020, and December 18, 2020 (summaries are available under ADAMS Accession Nos. ML20323A033 and ML20351A283, respectively).

## Background

The regulations in 10 CFR 50.55a include, in part, requirements for the use of Section XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) and the ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code) for the inservice inspection (ISI) and inservice testing (IST) of nuclear power plants. Specific editions and addenda of these ASME Codes have been incorporated by reference into 10 CFR 50.55a, subject to certain limitations. Every 10 years, licensees are required to update their ISI programs to the latest editions and addenda of the applicable ASME Code incorporated by reference in 10 CFR 50.55a.

The ASME Code, Section XI, requires the ISI of certain components to be completed during each of the 10-year ISI intervals for the service lifetime of the plant. Draft ASME Code Case N-921 would allow an ISI interval to be extended to 12 years. The NRC has not approved the use of draft ASME Code Case N-921. The 10-year ISI interval and the 10-year ISI program updates are separate requirements. The 10-year ISI interval was established through the

ASME consensus process and is a requirement of the ASME Code, Section XI. Whereas, the 10-year ISI program update interval was established and reaffirmed by the Commission as policy and was incorporated into 10 CFR 50.55a through the rulemaking process.

On March 15, 2021, the NRC staff issued SECY-21-0029 (ADAMS Accession No. ML20273A286) and requested to initiate a rulemaking to revise, in part, the frequency of the ISI program updates required in 10 CFR 50.55a. The rulemaking would revise the acceptable interval for program updates from the current 120-month interval to a 240-month interval after updating their IST and ISI programs to the most recent edition and addenda of the ASME OM Code and Code, Section XI incorporated by reference in 10 CFR 50.55a by the effective date of the final rule. In addition, the NRC staff requested Commission approval of a future rulemaking to extend the interval again, from 240 months to 288 months, if ASME increases the ISI interval to 12 years. On November 8, 2021, the Commission approved the staff's recommendation to initiate this rulemaking (ADAMS Accession No. ML21312A490).

As discussed during both the November 4, 2020, and December 8, 2020, meetings, Exelon previously planned to submit a proposed alternative under 10 CFR 50.55a or an exemption to accomplish, in part, a similar objective. The summary of both meeting states, in part:

The NRC staff stated that it would review and respond, as appropriate, to any licensing action that Exelon submitted. However, the staff believes the changes that Exelon is seeking should be implemented through a revision of 10 CFR 50.55a. The reasons provided in the presentation do not appear to be unique to Exelon. Therefore, it would be beneficial to consider the views of the broader industry and other stakeholders regarding Exelon's proposed changes. Additionally, the staff stated that Exelon should consider working through the ASME consensus committees to revise the ISI and IST intervals.

## **Discussion**

For the subject facilities, Exelon plans to request to implement the draft ASME Code Case N-921 as an alternative that would allow it to extend the ISI inspection interval from 10 years to 12 years. Exelon provided a summary of the Code Case in its presentation.

Exelon stated that it assumed the NRC-approved alternatives for the current 10-year ISI program intervals at its facilities would automatically extend to the end of the 12-year interval if it is approved for draft ASME Code Case N-921. The NRC staff stated that these previous approvals were for the 10-year interval. The NRC staff stated that if Exelon wants currently approved alternatives to apply to the extended interval then this should be discussed in the application to use draft Code Case N-921.

Exelon also stated that it did not see any concerns related to inspections associated with the license renewal of its facilities. The NRC staff stated that Exelon should discuss any impacts to the bases for the license renewal of its facilities in its application to use draft Code Case N-921.

At the November 16, 2021, meeting, the NRC staff reminded Exelon of the Commission policy in the Staff Requirements Memorandum (ADAMS Accession No. ML003702722) for SECY-00-0011, "Evaluation of the Requirement for Licensees to Update Their Inservice Inspection and Inservice Testing Programs Every 120 Months" (ADAMS Accession No. ML003675659), which directed the staff, in part, to maintain the current requirement of licensees updating their ISI programs every 10 years to the latest edition of the ASME Code that

is incorporated by reference in NRC regulations. The NRC staff asked how Exelon intends to remedy extending the ISI interval to 12 years with the requirement to update the ISI program every 10 years. While Exelon did not provide a detailed response, the staff recommends that any application submitted should provide such details.

The NRC staff noted that the regulations in 10 CFR 50.55a include several requirements imposed by the NRC that are on 10-year intervals that are not part of the ASME Code (e.g., the ISI program update requirements). The NRC staff noted that it would be challenging for the staff to approve alternatives to these requirements when it is not known what ASME Code edition and addenda are applicable to the next ISI interval. These challenges were also discussed during the November 4, 2020, and December 8, 2020, meetings.

Exelon's presentation provided a list of provisions in 10 CFR 50.55a and the ASME Codes that it had reviewed. Upon questioning by NRC staff, Exelon clarified that it would not be requesting an alternative to all the provisions listed.

Exelon's presentation also provided a list of precedents that it had identified to support its proposed alternative. Exelon provided precedents that they felt supported extending the ISI interval and remaining on the same edition of the ASME Code beyond the current interval. The NRC staff noted that the majority of the precedents related to ISI and IST interval extensions that were requested near the end of the 10-year interval period. While the NRC staff to acknowledge a few of the precedents did authorize the same edition of the ASME Code for another interval, the staff noted that were supported by supporting justification from the particular licensees. The NRC staff noted that for the listed precedents the licensees provided plant-specific reasons for the proposed alternative. Exelon is proposing to request the proposed alternative for its entire fleet but did not describe any plant-specific reasons for the proposed alternative. The NRC staff further noted that it would be challenging to justify extending usage of the same edition of the ASME Code beyond 10-years without providing a comparison between the current code of record and at the code of record that is required by 10 CFR 50.55a for the next interval. This would be particularly challenging for plants that have just started their current interval since the code of record for the next interval cannot be determined.

As in the November 4, 2020, and December 8, 2020, meetings, the NRC staff stated that it would review and respond, as appropriate, to any licensing action that Exelon submitted. The reasons provided in the presentation do not appear to be unique to Exelon. Therefore, it would be beneficial to consider the views of the broader industry and other stakeholders regarding Exelon's proposed changes. The staff reminded Exelon that the Commission has recently authorized rulemaking to revise the acceptable interval for program code-of-record updates from the current 120-month interval to a 240-month interval.

Exelon currently plans to submit the fleet alternative request later in 2021. The NRC staff noted that reviewing a fleet request may be challenging and Exelon should consider submitting for just one or two plants that are near the end of their current ISI interval. The NRC staff further noted that the rulemaking may be completed well before the end of the current ISI interval for many of Exelon's facilities. The staff stated that if the rulemaking proceeds as planned, then the proposed alternative may not be needed for these facilities. The NRC staff appreciated that the licensee held the meeting early in the development process so that any staff comment could be considered in the application.

No members of the public had questions or comments during the meeting. No regulatory decisions were made at this meeting.

Please direct any inquiries to me at 301-415-2855, or [Scott.Wall@nrc.gov](mailto:Scott.Wall@nrc.gov).

Sincerely,

*/RA/*

Scott P. Wall, Senior 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

cc: Listserv

LIST OF ATTENDEES

NOVEMBER 16, 2021, MEETING WITH EXELON GENERATION COMPANY, LLC

<b>Name</b>	<b>Affiliation</b>
Scott Wall	Nuclear Regulatory Commission (NRC)
Blake Purnell	NRC
Bob Caldwell	NRC
Brian Wittick	NRC
Nancy Salgado	NRC
Kerri Kavanagh	NRC
Angie Buford	NRC
Matthew Mitchell	NRC
Brian Lee	NRC
Dan Widrevitz	NRC
Laura Smith	NRC
Michael Benson	NRC
David Rudland	NRC
Keith Hoffman	NRC
Isaac Anchondo-Lopez	NRC
John Tsao	NRC
John Honcharik	NRC
Thomas Loomis	Exelon Generation Company, LLC (Exelon)
Sailaja Mokkalapati	Exelon
Mark Weis	Exelon
Mark DiRado	Exelon
Darani Reddick	Exelon
Heather Malikowski	Exelon
David Gudger	Exelon
Thomas Downing	Xcel Energy Prairie Island Plant
Steven Dolley	Inside NRC
Austin Keller	Duke Energy
Mark Pyne	Duke Energy

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RidsNrrPMExelon Resource	CDeMessieres, NRR
RidsNrrPMBraidwood Resource	RMurray, NRR
RidsNrrPMByron Resource	CNolan, OEDO
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RidsNrrPMLimerick Resource	JHoncharik, NRR
RidsNrrPMNineMilePoint Resource	MBenson, NRR
RidsNrrPMPeachBottom Resource	SCumblidge, NRR
RidsNrrPMQuadCities Resource	DWidrevitz, NRR
RidsNrrPMREGinna Resource	IAnchondo-Lopez, NRR
RidsNrrDex Resource	JTsao, NRR
RidsNrrDexEmib Resource	MDomke, RIII

**ADAMS Accession No.: ML21333A153**

OFFICE	NRR/DORL/LPL3/PM	NRR/DORL/LPL3/LA	NRR/DORL/LPL3/BC
NAME	SWall	SRohrer	NSalgado
DATE	11/29/2021	11/29/2021	11/30/2021
OFFICE	NRR/DORL/LPL3/PM		
NAME	SWall		
DATE	11/30/2021		

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