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NEI 03-08

December 15, 2021  
BW210082

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Braidwood Station, Unit 1  
Renewed Facility Operating License No. NPF-72  
NRC Docket No. STN 50-456

Subject: Notification of Deviation from Electric Power Research Institute (EPRI) Materials Reliability Program (MRP) 2019-008, "Interim Guidance for NEI 03-08 Needed Requirements for US PWR Plants for Management of Thermal Fatigue in Non-Isolable Reactor Coolant System Branch Lines"

In accordance with Appendix B, Section 8.1.c of Nuclear Energy Institute (NEI) 03-08, "Guideline for the Management of Materials Issues," Revision 4, Exelon Generation Company, LLC (EGC) is notifying the U.S. Nuclear Regulatory Commission (NRC) that Braidwood Station, Unit 1 has processed a deviation from "Needed" interim guidance (IG)#2 in EPRI Document MRP 2019-008, "Interim Guidance for NEI 03-08 Needed Requirements for US PWR Plants for Management of Thermal Fatigue in Non-Isolable Reactor Coolant System (RCS) Branch Lines," with appropriate justification and documentation.

MRP 2019-008 "Needed" requirements IG#2 requires a one-time examination of the Residual Heat Removal (RHR) suction lines that branch off the Reactor Coolant System (RCS) hot legs (1A and 1C). The one-time examination for the RHR suction line from the 1A RCS hot leg will not be performed by the required time frame of within two refueling outages after August 1, 2019. The examination has been deferred to refueling outage A1R23 (Fall 2022).

NEI 03-08 allows deviation from "Needed" elements with the appropriate justification and documentation. The deviation has been documented in accordance with EGC's corrective action program and approved by the appropriate levels of EGC management. The Attachment provides the EGC Braidwood Unit 1 technical justification for the deviation from MRP 2019-008.

In accordance with NEI 03-08, this letter is being transmitted for information only. EGC is not requesting any action from the NRC.

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This letter contains no new regulatory commitments.

If you have any questions concerning this letter, please contact Richard Schliessmann, acting Regulatory Assurance Manager, at (815) 417-2820.

Respectfully,

Keenan, John P.

Digitally signed by Keenan, John P.  
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John Keenan  
Site Vice President  
Braidwood Nuclear Generating Station

Attachment: Braidwood Unit 1 Justification for the Deviation from MRP 2019-008, Technical Evaluation 635273

cc: NRC Regional Administrator, Region III  
NRC Senior Resident Inspector- Braidwood Station  
NRC Project Manager – Braidwood Station  
Illinois Emergency Management Agency- Division of Nuclear Safety