

From: Purnell, Blake
Sent: Tuesday, February 8, 2022 10:46 AM
To: Loomis, Thomas R:(GenCo-Nuc) (thomas.loomis@exeloncorp.com)
Cc: Gudger, David T:(GenCo-Nuc); Salgado, Nancy; Wall, Scott
Subject: Public Meeting RE: Dresden/Quad Cities - Proposed Alternative to Use ASME Code Case N-921
Attachments: Topics for Discussion.pdf

Mr. Loomis,

By letter dated January 18, 2022 (ADAMS Accession No. ML22018A106), Exelon submitted an application for a proposed alternative to use ASME Code Case N-921 at Dresden and Quad Cities. The NRC staff is currently performing an acceptance review of the application. The NRC staff has identified that the following information may need to be provided before the NRC staff can accept the application for review:

1. Clarification of the scope of the proposed alternative.
2. Additional information to demonstrate that Code Case N-921 provides an acceptable level of quality and safety.
3. Changes to the currently approved alternatives and information to demonstrate that extending the duration of these alternatives meets 50.55a(z)(1) or (z)(2), as applicable.
4. All requests for NRC approval (e.g., exemptions or alternatives) necessary to implement this proposed alternative.
5. Code Case N-921, as it has not yet been published.

The NRC staff is requesting a public meeting with Constellation to discuss its application. The meeting will support the NRC staff's completion of the acceptance review of the application in a timely manner. Please be prepared to address: (1) the topics listed in the attachment to this email and (2) the time needed to provide the supplemental information listed above, if it is needed.

The NRC staff would like to hold the meeting between February 22 and 25, 2022. Please let me know by February 10, 2022, if Constellation can support a 2-hour meeting during this timeframe. I will coordinate with you to schedule the meeting.

Sincerely,

Blake Purnell, Project Manager
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
ph: 301-415-1380

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**Topics for Discussion
Public Meeting Regarding
Dresden/Quad Cities Alternative to Use Code Case N-921**

1. The following regulations specify requirements for the 120-month ISI interval:
 - 50.55a(b)(5) – Conditions in ISI Code Cases
 - 50.55a(g)(4)(ii) – Required Edition of Section XI for subsequent intervals
 - 50.55a(g)(5) – ISI program updates per (g)(4) and impractical requirements

During the three related pre-application meetings, the NRC staff stated that changes to the Code of Record update interval should be implemented through the rulemaking process. During the 11/16/21 pre-application meeting regarding this proposed alternative, the staff stated that this application should describe how the facilities would comply with these rule requirements when the ISI/CISI program intervals are extended to 12-years. However, the application did not provide this information.

- a. When will the Code of Record and ISI/CISI programs be updated? Will this update be applied to the extended portion of the current interval?
 - b. Will the latest versions of Code Cases in RG 1.147 be applied to extended portion of ISI/CISI intervals?
 - c. When will notifications of impracticality be submitted?
2. The application requests approval of the proposed alternative near the end of the current ISI intervals. The NRC staff would expect most, if not all, inservice inspections to have been completed by the time the review is completed. What inservice inspections will be performed during the 2-year extension of the ISI intervals?
3. The application emphasizes the general benefits of the code case, rather than demonstrating that the proposed alternative will provide an acceptable level of quality and safety. The technical justification for extending the intervals at Dresden and Quad Cities need to be provided.
4. The application states: “The proposed alternative does not impact inspections required to be performed prior to the end of the license renewal period.” However, the current ISI and CISI intervals end prior to the end of the license renewal period. What was meant by this statement?
5. The application requests approval for the current ISI interval but discusses the benefits for the next ISI interval. Describe any changes to the next ISI interval that are being requested as part of this application. Will the start date for the next interval be revised or will the current and next interval overlap?

6. The application states: "Enclosure 1 contains a listing of the relief requests for the fifth ISI and third CISI interval at Dresden and Quad Cities that will be extended from 10 to 12 years." Clarify whether the extension of the alternatives listed in Enclosure 1 is being requested as part of this proposed alternative or if separate requests will be provided.
 - a. Describe any changes to these alternatives that would be needed to extend their duration (e.g., changes to the PRA for risk-informed ISI).
 - b. Provide justification for extending each alternative in accordance with 50.55a(z)(1) or z(2), as applicable.
7. Based on the response to the items above, identify any additional NRC approvals (e.g., exemptions or alternatives) that will be needed to implement the proposed alternative.