

NRC Acceptance Review

Dresden and Quad Cities
Proposed Alternative to Use
ASME Code Case N-921
ML22018A106

Ground Rules

- Identify yourself when speaking
- Mute if not speaking
- No regulatory decisions will be made
- Information needed to accept application for review will be discussed
- Technical adequacy will not be discussed
- Related rulemaking will not be discussed

Purpose

- Clarify scope of proposed alternative
- Identify information needed to accept application for review
- Identify any additional NRC approvals needed to implement proposed alternative
- Discuss timeframe for licensee to provide supplemental information and additional requests for approval

Background

- Pre-application meetings:
 - 11/4/20 ML20323A033
 - 12/18/20 ML20351A283
 - 11/16/21 ML21333A153
- Exemption Request (withdrawn)
 - 3/3/21 Application ML21063A179
 - 4/8/21 NRC Letter ML21077A177
- Proposed Alternative (under acceptance review)
 - 1/18/22 Application ML22018A106
 - 2/8/22 NRC email ML22039A204

Regulatory Requirements

- 50.55a requires Section XI for ISI/CISI at nuclear power plants
- **Inspection Interval:** Section XI requires ISI/CISI of components to be completed within a defined 10-year interval for service life of plant
- **CoR Update Interval:** Separately, 50.55a requires licensees to update the CoR every 10 years to the latest edition/addenda of Section XI incorporated into the rule
- The inspection interval and CoR update interval coincide, but they are separate requirements

Regulatory Requirements (Continued)

- 50.55a(z) allows the NRC staff to approve alternatives to specific ASME Code requirements incorporated by reference in 50.55a
- **Inspection Interval** is an ASME Code requirement that is incorporated by reference in 50.55a
 - Rulemaking (preferred) or 50.55a(z) to make changes
- **CoR Update Interval** is an NRC requirement not an ASME Code requirement
 - Rulemaking (preferred) or 50.12 exemption to make changes
 - 50.55a(z) cannot be used to make changes

Summary of Proposed Alternative

- Adopts Code Case N-921 for current ISI/CISI intervals at Dresden and Quad Cities
- Code Case N-921 allows **Inspection Interval** to be extended from 10 years to 12 years
 - ISI extended from 2023 to 2025
 - CISI extended from 2028 to 2030
- Approved alternatives extended?
- One alternative under review extended?

NRC Staff Questions and Comments

Compliance with 50.55a

- 12-year inspection interval would not align with 120-month CoR update interval
- How will sites comply with the following 120-month requirements?
 - 50.55a(g)(4)(ii) CoR update
 - 50.55a(b)(5) Conditions on ISI Code Cases
 - 50.55a(g)(5) program update and impracticality determinations

Compliance with 50.55a (continued)

- When will the CoR and ISI/CISI programs be updated? Will this update be applied to the extended portion of the current inspection interval?
- Will the latest versions of Code Cases in RG 1.147 be applied to extended portion of the inspection intervals?
- When will notifications of impracticality be submitted?

ISI During Extended Interval

- Approval is requested near end of the current ISI interval
- What ISI will be performed during the 2-year extension?

Justification for Extending Inspection Intervals at Dresden/Quad Cities

- 50.55a(z)(1) requires licensee to demonstrate proposed alternative provides acceptable level of quality and safety
- Application focuses on generic and future benefits
- Technical justification for extending current inspection intervals at Dresden/Quad Cities needs to be provided

Inspection Impacts

- Application states: “The proposed alternative does not impact inspections required to be performed prior to the end of the license renewal period.”
- This implies that the proposed alternative would not change any inservice inspections
- What was meant by this statement?

Next ISI/CISI Intervals

- Application request approval for current inspection interval
 - Application describes benefits for next inspection interval
 - Approval only for current interval cannot have any affect on a future interval
- Will the start date for the next inspection interval be revised or will the current and next inspection interval overlap?
- Describe and provide basis for any changes to the next inspection interval that are being requested as part of this application

Extension of Approved Alternatives

- Application lists approved alternatives that “will be extended from 10 years to 12 years”
- Is application requesting these extensions or will separate requests be provided?
- Provide the revised alternatives
- Provide justification for extending each alternative per 50.55a(z)(1) or z(2)

Additional Issues

- Application lists an alternative for extension that has not been approved
 - Per LIC-109 linked requests should not be accepted

NRC Staff

Additional Questions and Comments

Wrap-Up

- Summary of additional information to be provided
- Summary of additional approvals needed to implement proposed alternative
- Per LIC-109, the deadline for providing supplemental information is 13 working days
 - Can licensee provide supplement and additional requests by March 16?

Public Comments

Terms and Acronyms

- ASME – American Society of Mechanical Engineers
- Section XI – Section XI (Inservice Inspection) of the ASME Boiler and Pressure Vessel Code
- CoR – Code of Record
- ISI – inservice inspection
- CISI – containment inservice inspection
- 50.55a – Title 10 of the *Code of Federal Regulations* Section 50.55a
- LIC-109 – Office Instruction for Acceptance Reviews