

July 19, 2022

10 CFR 50.55a

RS-22-099

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

Dresden Nuclear Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

Subject: Submittal of Upcoming Sixth Inservice Inspection Interval Relief Requests I6R-09 and I6R-10

Reference: Letter from N.L. Salgado (U.S. NRC) to B.C. Hanson (Exelon Generation Company, LLC), "Byron Station, Unit Nos. 1 And 2; 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; and Quad Cities Nuclear Power Station, Units 1 And 2 – Request to Use Provisions in the 2013 Edition of the ASME Boiler And Pressure Vessel Code For Performing Non-Destructive Examinations (EPID L-2019-LLR-0080)," dated April 17, 2020 (ADAMS Accession No. ML20099D955)

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (z)(1), Constellation Energy Generation (CEG), LLC requests NRC approval of relief requests I6R-09 and I6R-10 associated with the Sixth Inservice Inspection (ISI) Interval for Dresden Nuclear Power Station (DNPS), Units 2 and 3.

Request I6R-09 proposes the synchronization of the DNPS, Units 2 and 3 Containment Inservice Inspection (CISI) Program with the Inservice Inspection (ISI) Program intervals. This request is included as Attachment 1.

The Sixth Interval of the DNPS, Units 2 and 3, ISI Program will comply with the 2017 Edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code. However, Request I6R-10 proposes short-term application of certain 2013 Edition non-destructive examination requirements to maintain DNPS requirements consistent with the remainder of the CEG fleet. Request I6R-10 is included as Attachment 2.

The Sixth ISI Interval at DNPS will begin on January 20, 2023; accordingly, CEG requests approval of this request by January 19, 2023, to support the Sixth ISI Interval.

There are no regulatory commitments contained within this letter. Should you have any questions concerning this letter, please contact Mr. Mitchel A. Mathew at 630-657-2819.

Respectfully,

A handwritten signature in black ink, reading "Patrick R. Simpson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Patrick R. Simpson
Sr. Manager – Licensing
Constellation Energy Generation, LLC

Attachments:

1. 10 CFR 50.55a Relief Request I6R-09, Rev. 0
2. 10 CFR 50.55a Relief Request 16R-10, Rev. 0

cc: NRC Regional Administrator, Region III
NRC Senior Resident Inspector – Dresden Nuclear Power Station

ATTACHMENT 1 - 10 CFR 50.55a Relief Request I6R-09
Synchronization of the CISI Interval for Class MC Components and their Integral Attachments to Coincide with the ISI Interval for Class 1, 2, and 3 Components and their Supports in Accordance with 10 CFR 50.55a(z)(1) -- Alternative Provides Acceptable Level of Quality and Safety -- Revision 0

1. ASME Code Component(s) Affected

Code Class:	MC
Reference:	IWA-2430
	IWA-2431
	IWE-2411(a)
Examination Category:	All IWE
Item Number:	All IWE
Description:	Synchronization of the CISI Interval for Class MC Components and their Integral Attachments to Coincide with the ISI Interval for Class 1, 2, and 3 Components and their Supports
Component Number:	Class MC Components

2. Applicable Code Edition

The Third Interval of the Dresden Nuclear Power Station (DNPS), Units 2 and 3 Containment Inservice Inspection (CISI) Program is based on the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code, Section XI, 2013 Edition, Subsections IWA and IWE.

3. Applicable Code Requirement

IWA-2430(b) requires that "The inspection interval shall be determined by calendar years following placement of the plant into commercial service."

IWA-2430(c)(1) requires, in part, that "Each inspection interval may be extended by as much as 1 year and may be reduced without restriction, provided the examinations required for the interval have been completed. Successive intervals shall not extend more than 1 year beyond the original pattern of 10-year intervals and shall not exceed 11 years in length."

IWA-2430(c)(3) requires, in part, that "That portion of an inspection interval described as an inspection period may be extended by as much as 1 year and may be reduced without restriction, provided the examinations required for that period have been completed."

IWA-2431(b) requires that successive inspection intervals shall be "10 years following the previous inspection interval."

IWE-2411(a) requires, in part, that "Examinations ... shall be completed during each successive inspection interval, in accordance with Table IWE-2411-1." Table IWE-2411-1 specifies that inspection periods shall terminate at the end of years 3, 7, and 10 within the inspection interval.

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of Quality and Safety -- Revision 0

4. Reason for Request

Pursuant to 10 CFR 50.55a(z)(1), relief is requested from the specified requirements of IWA-2430(b), IWA-2430(c)(1), IWA-2430(c)(3), IWA-2431(b), and IWE-2411(a) on the basis that the proposed alternative provides an acceptable level of quality and safety.

Specifically, relief is requested to reduce the duration of the Third CISI Program Interval to allow the subsequent inspection interval to align with the inspection interval for Class 1, 2, and 3 components. CISI Programs were initially required by regulation (i.e., 10 CFR 50.55a) as amended within a Final Rule (61 FR 41303) issued on August 8, 1996. Accordingly, the DNPS, Units 2 and 3 first CISI Program was prepared and implemented at that time, which was roughly four years out of sync with the station Inservice Inspection (ISI) Program. The CISI Program has been maintained since that point in accordance with the governing Regulation and associated ASME Code requirements.

The current (Third) CISI Interval is effective from September 9, 2018 through September 8, 2028 for DNPS, Units 2 and 3. The examinations required by the CISI Program have been established for the Third CISI Interval in accordance with all applicable IWE requirements, and the IWE examinations scheduled for the first period for both DNPS, Units 2 and 3 have all been completed. Both units are currently in the second periods within the interval.

This request for alternative seeks to end the Third CISI Interval for DNPS, Units 2 and 3 on January 19, 2023, which will permit commencement of the next (i.e., Fourth) CISI Interval to coincide with the start date of the upcoming Sixth ISI Interval on January 20, 2023. This will result in both the ISI and CISI Programs being on the same pattern of intervals and being under the same ASME Section XI Code Edition for the next and successive intervals.

The supplementary information contained within Section 2.2 of former Final Rule (67 FR 60520) dated September 26, 2002, contains statements supporting the proposed alternative for modifying the CISI Interval. Specifically, the information pointed out that 10 CFR 50.55a(g)(4)(ii) does not prohibit licensees from updating to a later Edition and Addenda of ASME Section XI midway through a ten-year IWE examination interval. Additionally, the information advised that "Licensees wishing to synchronize their 120-month intervals may submit a request in accordance with Section 50.55a(a)(3) to obtain authorization to extend or reduce 120-month intervals."

In conclusion, Constellation Energy Generation (CEG), LLC concludes that authorizing the proposed alternative as described herein provides an acceptable level of quality and safety, and does not adversely impact the health and safety of the public.

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5. Proposed Alternative and Basis for Use

In lieu of the requirements specified in Section 3 of this request, CEG proposes the following alternatives:

- The Third CISI Interval duration will be modified to end on January 19, 2023, in order to coincide with the upcoming ISI Interval transition. Subsequent CISI intervals will follow all requirements specified within and allowed by IWA-2430, based on the applicable ASME Section XI Code Edition as defined by the start date of the Fourth CISI Interval and the governing Regulation at that time (e.g., 18 months prior to the start of the fourth interval and then similarly for subsequent intervals).
- Subsequent CISI intervals will comply with the applicable requirements of ASME Section XI as specified by 10 CFR 50.55a, including any applicable conditions in 10 CFR 50.55a(b)(2), based on the sequencing of intervals from the new synchronized CISI and ISI Interval date.
- Items requiring a general visual examination each inspection period, which for DNPS includes the metal containment accessible surfaces and moisture barrier, will continue to be conducted each period.
- Items requiring a VT-3 visual examination each inspection Interval, which for DNPS includes the submerged containment wetted surface and the containment vent system accessible surfaces, will remain scheduled for examination in the outage identified in the current Third CISI Interval. This outage will be maintained as currently scheduled, and the examinations will be completed under the Fourth CISI Interval Program. Subsequent Intervals will be scheduled consistent with ASME Section XI Examination Category E-A, Note 2, as specified in the 2017 Edition. This note requires that "successive examinations are performed no less frequently than every third period." This approach will assure that the current sequencing of examinations remains unchanged and that the time between examinations will not be modified due to the administrative synchronization of the CISI and ISI intervals.

Use of the proposed alternative will allow the use of a common ASME Section XI Code Edition for both CISI and ISI activities on Class 1, 2, 3, and MC components, starting on January 20, 2023. This will facilitate program and inspection procedures being maintained and implemented to one common Code Edition and associated set of requirements. The common Code Edition will reduce the chance of applying incorrect ISI/CISI requirements for specific component examinations. Common interval dates, procedures, and documents will also reduce the administrative burden of performing multiple intervals updates and will maintain the quality and safety of the CISI and ISI Programs in accordance with the latest Regulations, Codes, and Standards.

For the above reasons, CEG asks that this request be approved on the basis that the proposed alternative provides an acceptable level of quality and safety, in accordance with 10 CFR 50.55a(z)(1).

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of Quality and Safety -- Revision 0

6. Duration of Proposed Alternative

Relief is requested for the Third CISI Interval for DNPS, Units 2 and 3.

7. Precedents

- Limerick Generating Station, Units 1 and 2 Relief Request I3R-01 "Relief Requests I3R-01 for Alignment of Inservice Inspection and Containment Inservice Inspection (TAC Nos. MD2727 and MD2728)" was authorized by the Nuclear Regulatory Commission (NRC) Safety Evaluation Report (SER) dated January 24, 2007 (NRC Accession No. ML063390103)
- Byron Generating Station, Units 1 and 2 Relief Request I3R-01 "Byron Station, Unit Nos. 1 and 2 - Evaluation of Inservice Inspection Program Relief Request I3R-01 (TAC Nos. MD1209 and MD1210)" was authorized by the NRC SER dated September 7, 2006 (NRC Accession No. ML062280606)
- Susquehanna Steam Electric Station, Units 1 and 2 Relief Request 3RR-10 "Susquehanna Steam Electric Station, Units 1 and 2 - Third 10-Year Inservice Inspection (ISI) Interval Program Plan (TAC Nos. MC1185, MC1186, MC1191, MC1192, MC1193, MC1194, MC1195, MC1196, MC1197, MC1198, MC1199, and MC1200)" was authorized by the NRC SER dated September 24, 2004 (NRC Accession No. ML042680078)

8. References

None

ATTACHMENT 2 - 10 CFR 50.55a Relief Request I6R-10 for Dresden Nuclear Power Station, Units 2 and 3, Alternative to Permit Continued Application of Certain ASME Section XI 2013 Edition NDE Requirements for Short Term Fleet Consistency in Accordance with 10 CFR 50.55a(z)(1) - Alternative Provides Acceptable Level of Quality and Safety -- Revision 0

1. ASME Code Component(s) Affected

Code Class: 1, 2, 3, and MC
Reference: ASME Section XI, 2013 Edition
ASME Section XI, 2017 Edition
Examination Category: All, as related to NDE Methods and Requirements
Item Number: All, as related to NDE Methods and Requirements
Description: Alternative to Permit Continued Application of Certain ASME Section XI 2013 Edition NDE Requirements for Short Term Fleet Consistency
Components: Class 1, 2, 3, and MC Component Exams

2. Applicable Code Edition

The Sixth Interval of the Dresden Nuclear Power Station (DNPS), Inservice Inspection (ISI) Program will be based on the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code, Section XI, 2017 Edition.

The Fifth Interval of the DNPS, Units 2 and 3, ISI Program is currently based on the ASME Section XI, 2013 Edition for all Non-Destructive Examination (NDE) Requirements. The approval for the 2013 Edition NDE requirements was made under NRC Safety Evaluation dated April 17, 2020 (ML20099D955). Similarly, all Constellation Energy Generation, LLC (CEG) plants are currently standardized to the 2013 Edition for NDE requirements, either via this same relief request or under the normal plant ISI Program ASME Section XI code of record.

3. Applicable Code Requirement

CEG is now required to update the DNPS, Units 2 and 3, ISI Program for the Sixth Interval to the latest Edition of the ASME BPV Code, Section XI, approved by the Nuclear Regulatory Commission (NRC) in 10 CFR 50.55a(a).

10 CFR 50.55a(g)(4)(ii), *Applicable ISI Code: Successive 120-month intervals*, states:

"Inservice examination of components and system pressure tests conducted during successive 120-month inspection intervals must comply with the requirements of the latest edition and addenda of the ASME Code incorporated by reference in paragraph (a) of this section 18 months before the start of the 120-month inspection interval..."

In accordance with 10 CFR 50.55a(a)(1)(ii)(C)(55), the 2017 Edition is the latest NRC approved version of ASME Section XI as of 18 months prior to the DNPS Sixth ISI Interval start date.

ATTACHMENT 2 - 10 CFR 50.55a Relief Request I6R-10 for Dresden Nuclear Power Station, Units 2 and 3, Alternative to Permit Continued Application of Certain ASME Section XI 2013 Edition NDE Requirements for Short Term Fleet Consistency in Accordance with 10 CFR 50.55a(z)(1) - Alternative Provides Acceptable Level of Quality and Safety -- Revision 0

4. Reason for Request

The DNPS, Units 2 and 3, Sixth ISI Interval is currently scheduled to begin on January 20, 2023.

The CEG fleet approval for all CEG plants to be governed by the NDE requirements of the 2013 Edition of ASME Section XI will expire for DNPS on that date. As such, the new Sixth Interval ISI Program for DNPS will be required to update to the 2017 Edition based on 10 CFR 50.55a(g)(4)(ii).

The reason for maintaining the CEG fleet of plants on a common Code Edition specifically for NDE requirements is that all CEG plants perform inservice inspection related NDE activities in accordance with a standardized fleet program. The standardized NDE requirements and procedures are currently based on the 2013 Edition of ASME, Section XI. While the overall ISI Program requirements are managed in site-specific documents under plant specific code editions, the NDE program is controlled in common corporate procedures that are implemented across the entire nuclear fleet.

This standardization is currently based on either the NRC Safety Evaluation approval referenced above or is in accordance with the individual plant ASME Section XI code of record for the station's ISI Program. On April 17, 2020, DNPS, Units 2 and 3, QCNPS, Units 1 and 2, Byron Station, Units 1 and 2, James A. FitzPatrick Nuclear Power Plant, LaSalle County Station, Units 1 and 2, and Limerick Generating Station, Units 1 and 2, updated the respective ISI Programs NDE requirements to the 2013 Edition of ASME Section XI as approved in accordance with 10 CFR 50.55a(g)(4)(iv). Under the provisions of CEG Fleet Letter Request RS-19-089 (JAFP-19-0084), these CEG sites were approved to use ASME Section XI, 2013 Edition for the performance of NDE activities through the end of the current ISI intervals in order to allow use of common CEG procedures, processes, training, knowledge, and technical skills.

For DNPS, Units 2 and 3, this approval is limited to the remainder of the Fifth ISI Interval. Because of the difference in the interval start date for DNPS as compared to the other CEG sites, the upcoming Sixth Interval for DNPS would require development and implementation of a separate and unique NDE Program with unique supporting procedures affecting multiple organizations.

Additionally, CEG would be required to create a unique skill set with unique training applicable only to DNPS. The aforementioned requirements minimize the potential for using shared resources of other CEG sites, present human performance concerns when applying different criteria, and prevent the use of common site and fleet procedures.

Pursuant to 10 CFR 50.55a(a)(z)(1), CEG requests authorization to continue to utilize the NDE specific requirements in the 2013 Edition of ASME Section XI for DNPS, Units 2 and 3, for a period of time consistent with the First Period of the new Sixth Interval. The conclusion of the First Period for DNPS, Units 2 and 3, coincides with the time when the balance of the plants in the CEG fleet will update to the latest ASME Section XI NDE requirements approved in 10 CFR 50.55a. The continued use of ASME Section XI 2013

ATTACHMENT 2 - 10 CFR 50.55a Relief Request I6R-10 for Dresden Nuclear Power Station, Units 2 and 3, Alternative to Permit Continued Application of Certain ASME Section XI 2013 Edition NDE Requirements for Short Term Fleet Consistency in Accordance with 10 CFR 50.55a(z)(1) - Alternative Provides Acceptable Level of Quality and Safety -- Revision 0

Edition for the First Period at DNPS will be limited to the performance of NDE activities and is subject to the applicable conditions contained in 10 CFR 50.55a(b)(2).

5. Proposed Alternative and Basis for Use

In lieu of the requirements specified in this request, CEG proposes to continue to utilize the 2013 Edition of ASME Section XI for NDE activities related to performing inservice inspections during the First Period of the new Sixth Interval. In implementing this proposed alternative, CEG will also comply with all applicable NRC conditions and limitations specified in 10 CFR 50.55a(b)(2) related to the NDE requirements of the ASME Section XI 2013 Edition.

Specifically, CEG is requesting the continued use of the provisions in the 2013 Edition of ASME Section XI for NDE activities associated with inservice inspections. These NDE activities are primarily driven from ASME Section XI Subarticles IWA-2100, IWA-2200, and IWA-2300. CEG will comply with all related NDE requirements of the 2013 Edition of ASME Section XI, as they interface with the General Requirements of IWA-1000 as well as certain Mandatory and Nonmandatory Appendices.

This request will allow DNPS to remain standardized with the rest of the CEG fleet for NDE requirements, until the balance of the plants update to the latest approved edition of ASME Section XI, nominally at the end of the DNPS First Period of the new Sixth Interval.

It is important to note that this request does not apply to the balance of the ISI Program including the selection, planning, and scheduling of ISI examinations and tests as defined in IWB-, IWC-, IWD-, IWE-, and IWF-2500 or NRC approved ISI alternatives. Therefore, ISI examinations and tests will be selected, planned, and scheduled in accordance with the Sixth Interval Code of Record, which will be the 2017 Edition of ASME Section XI.

Continued application of the 2013 Edition of ASME Section XI specifically for NDE requirements (consistent with the other CEG sites) will provide an acceptable level of quality and safety and will enhance the effective management and implementation of the NDE activities at DNPS. Approval of this request supports CEG's ability to maximize efficiencies, minimize human performance and procedure error traps, and optimize the use of internal operating experience as all CEG units will continue to utilize common procedures, processes, training, and knowledge for NDE implementation.

6. Duration of Proposed Alternative

Relief is requested for the Sixth ISI Interval, First Inspection Period, for DNPS, Units 2 and 3.

ATTACHMENT 2 - 10 CFR 50.55a Relief Request I6R-10 for Dresden Nuclear Power Station, Units 2 and 3, Alternative to Permit Continued Application of Certain ASME Section XI 2013 Edition NDE Requirements for Short Term Fleet Consistency in Accordance with 10 CFR 50.55a(z)(1) - Alternative Provides Acceptable Level of Quality and Safety -- Revision 0

7. Precedents

- Exelon Generation Company Fleet Letter Request RS-19-089 (JAFP-19-0084) "Byron Station, Unit Nos. 1 and 2; 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; and Quad Cities Nuclear Power Station, Units 1 and 2 - Request to Use Provisions in the 2013 Edition of the ASME Boiler and Pressure Vessel Code for Performing Non-Destructive Examinations (EPID L-2019-LLR-0080)" was approved by the NRC Safety Evaluation (SE) dated April 17, 2020 (NRC Accession No. ML20099D955)

- Arkansas Nuclear One, Unit 2 (AN0-2) Relief Request AN02-ISI-021, "Arkansas Nuclear One, Unit 2 - Request for Alternative AN02-ISI-021 to Permit Continued Application of the 2007 Edition through the 2008 Addenda of the ASME Code (EPID L-2018-LLR-0122)" was approved by the NRC SE dated June 11, 2019 (NRC Accession No. ML19156A400)

8. References

None