



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

**January 12, 2023**

**DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3 – AUTHORIZATION AND SAFETY  
EVALUATION FOR ALTERNATIVE REQUEST I6R-09 (EPID: L-2022-LLR-0056)**

**LICENSEE INFORMATION**

**Recipient's Name and Address:** Mr. David P. Rhoades  
Senior Vice President  
Constellation Energy Generation, LLC  
President and Chief Nuclear Officer  
Constellation Nuclear  
4300 Winfield Road  
Warrenville, IL 60555

**Licensee:** Constellation Energy Generation, LLC

**Plant Name and Units:** Dresden Nuclear Power Station (Dresden), Units 2 and 3

**Docket Nos.:** 50-237 and 50-249

**APPLICATION INFORMATION**

**Submittal Date:** July 19, 2022

**Submittal Agencywide Documents Access and Management System (ADAMS) Accession No.:** ML22200A258

**Applicable inservice inspection (ISI) program interval and interval start/end dates:**

The third containment inservice inspection (CISI) will be modified to end 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 scheduled to begin on January 20, 2023, and end on January 19, 2033.

**Alternative Provision:** The applicant requested an alternative under Title 10 of the *Code of Federal Regulations* (10 CFR), paragraph 50.55a(z)(1).

**Applicable Code Edition:** The third interval of the Dresden, Units 2 and 3, containment inservice inspection (CISI) program is based on Section XI of the 2013 Edition of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME) Code.

**Applicable Code Requirements:** ASME Code, Section XI, Subsection IWA, Article 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.

**Brief Description of the Proposed Alternative:** Pursuant to 10 CFR 50.55a(z)(1), an alternative was requested from the specified requirements of IWA-2430(b), IWA-2430(c)(1), IWA-2430(c)(3), IWA-2431(b), and IWE-2411(a). Specifically, the proposed alternative requested to reduce the duration of the third CISI program interval.

The request for alternative sought to end the third CISI interval for Dresden, 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 edition of the ASME Code, for the next and successive intervals.

## TECHNICAL EVALUATION

To determine whether the proposed alternative will provide an acceptable level of quality and safety, the NRC staff’s review focused on its effect on the implementation of the ASME Code-required ISI. The proposed alternative will allow the use of a common ASME Code, Section XI, edition for both CISI and ISI activities on Class 1, 2, 3, and major components, starting on January 20, 2023. This will facilitate program and inspection procedures being maintained and implemented to one common ASME Code edition and associated set of requirements. The common ASME Code edition will reduce the chance of applying incorrect ISI and CISI requirements for specific component examinations. Common interval dates, procedures, and documents will also maintain the quality and safety of the CISI and ISI programs in accordance with the latest regulations, codes, and standards.

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 Code, Section XI, midway through a 10-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.”

Based on the above discussion, NRC staff approves this proposed alternative request I6R-09.

## **CONCLUSION**

The NRC staff has determined that the proposed alternative in the licensee's request referenced above would provide an acceptable level of quality and safety.

The NRC staff concludes that the licensee has adequately addressed the regulatory requirements set forth in 10 CFR 50.55a(z)(1).

The NRC staff authorizes the use of proposed alternative I6R-09 at Dresden, Units 2 and 3 for the fourth CISI interval to coincide with the sixth ISI interval.

All other ASME Code, section XI, requirements for which an alternative was not specifically requested and authorized remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

**Principal Contributor:** Nan Chien

**Date:** January 12, 2023

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Nancy L. Salgado, Chief  
Plant Licensing Branch III  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

cc: Listserv

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