

Dresden Nuclear Power Station Subsequent License Renewal Application



**Pre-Submittal Meeting
June 28, 2023**



Constellation

Agenda

- Introductions
- General Plant Information
- 10 CFR Part 54 Safety Application Approach
 - Scoping and Screening
 - Aging Management Review
 - Aging Management Programs
 - TLAA and Exemption Identification
 - Operating Experience
- Lessons Learned/Discussion Topics
- Project Management
- Schedule and Closing Remarks
- Questions and Answers

Introductions

Speakers

Chris Wilson – Director, License Renewal

Casey Muggleston – License Renewal Engineering Manager

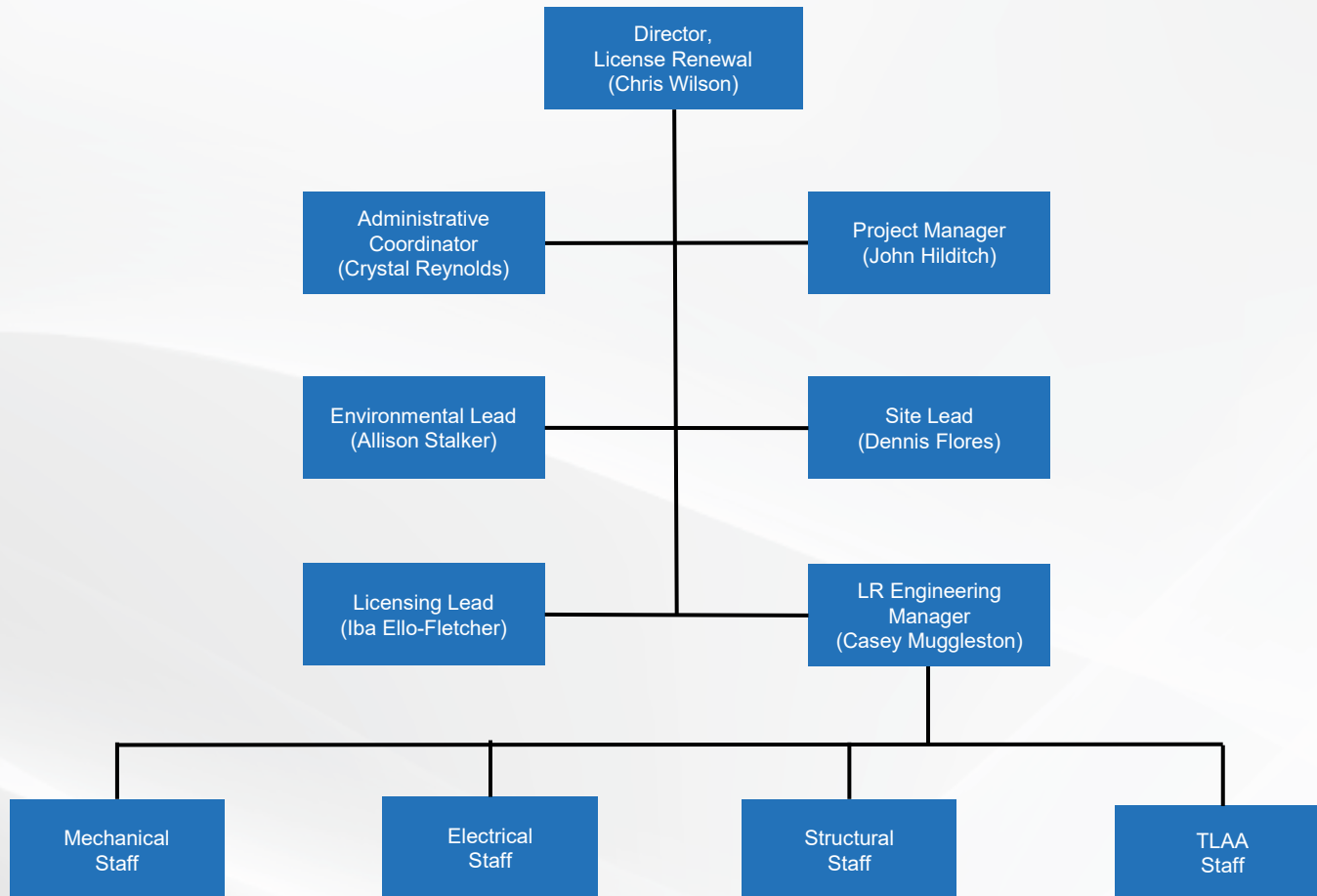
Participants

Dennis Flores – LR Site Lead

Iba Ello-Fletcher – Licensing Lead

John Hilditch – Project Manager

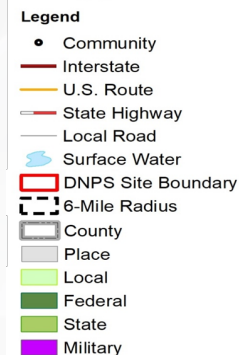
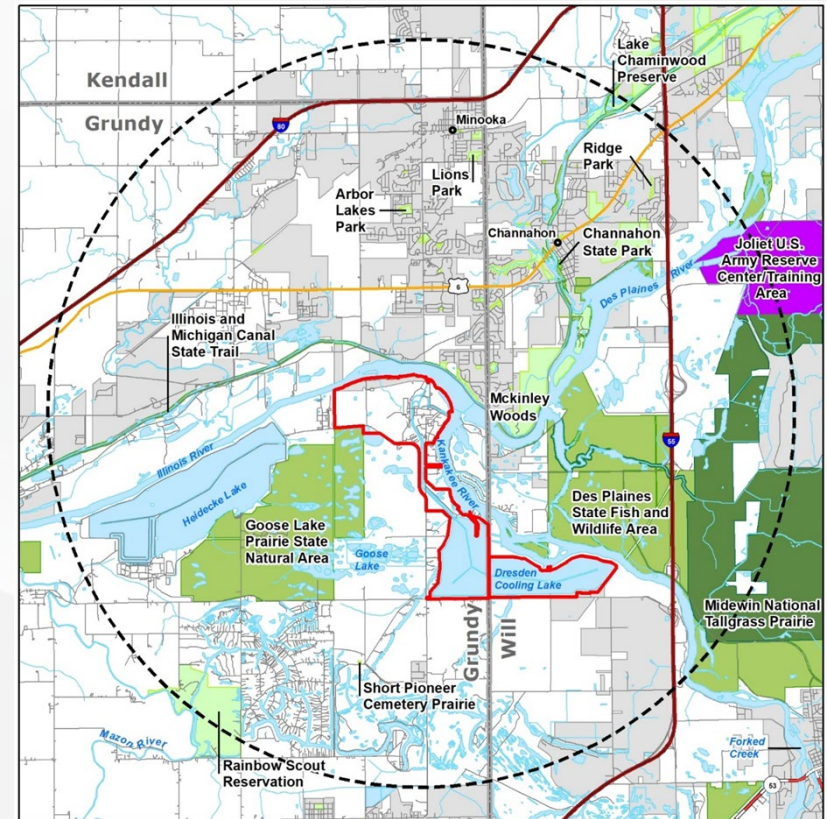
Dresden Nuclear Power Station SLR Project Team



General Plant Information

Dresden Nuclear Power Station (DNPS)

- A three-unit BWR plant:
 - Unit 1 (GE BWR-1) was officially retired on August 31, 1984, but its major structures are still present and intact. Placed in a safe storage condition (SAFSTOR).
 - Unit 2 (GE BWR-3/Mark I Containment) is located on the site directly west of and adjacent to Unit 1.
 - Unit 3 (GE BWR-3/Mark I Containment) is located on the site directly west of and adjacent to Unit 2
- The site is located northeast of Morris in Grundy County, Illinois.



General Plant Information

Power Uprate History

- Current rated core thermal power of 2957 MWt for each unit (Unit 2 and Unit 3).
 - Original licensed core thermal power of 2527 MWt.
 - Extended Power Uprate approved in 2001 (Amendment Nos. 191 (Unit 2) & 185 (Unit 3), approximately 17% Uprate)
- Current gross electrical output of 1003 Mwe for each unit (Unit 2 and Unit 3), for a total of 2006 Mwe.

Overview of Initial License Renewal

- Initial License Renewal Application was submitted on January 3, 2003 and approved on October 28, 2004. It was submitted as a combined application with Quad Cities Nuclear Power station. DNPS SLR will be submitted independently.
- Unit 2 entered PEO on December 22, 2009 and Unit 3 entered PEO on January 12, 2011
- Renewed Operating Licenses expire on December 22, 2029 for Unit 2, and on January 12, 2031 for Unit 3.

General Plant Information

Major Plant Structures

1. Unit 1 Reactor Building
2. Unit 1 Turbine Building
3. Unit 2 Turbine Building
4. Unit 3 Turbine Building
5. Unit 2 Reactor Building
6. Unit 3 Reactor Building
7. Administrative Building
8. U3 HPCI & U2/3 Diesel Generator Building
9. Unit 2/3 Cribhouse
10. 138 kV Switchyard
11. Unit 1 ISFSI Pad
12. Unit 2/3 ISFSI Pad
13. Station Blackout Building

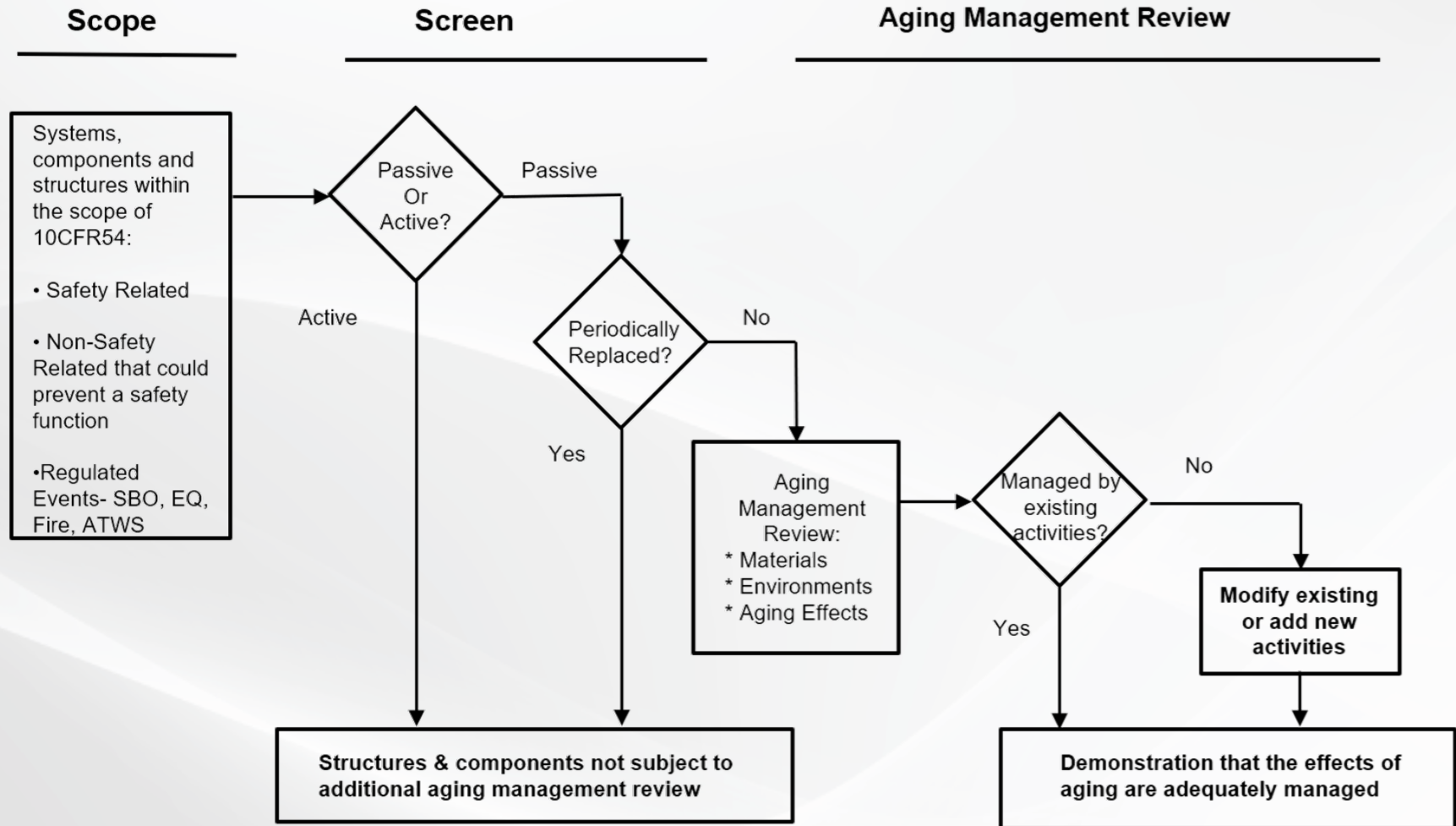


10 CFR Part 54 Safety Application Approach

Regulatory Guidance

- The Subsequent License Renewal Application (SLRA) format and content is based on:
 - **NUREG-2192**, “Standard Review Plan for Review of Subsequent License Renewal Applications for Nuclear Power Plants,” Revision 0
 - **NUREG-2191**, “Generic Aging Lessons Learned for Subsequent License Renewal (GALL-SLR) Report,” Revision 0
 - **Regulatory Guide 1.188**, “Standard Format and Content for Applications To Renew Nuclear Power Plant Operating Licenses,” Revision 2
 - **SLR Interim Staff Guidance (ISGs)**

10 CFR Part 54 Safety Application Approach



10 CFR Part 54 Safety Application Approach

- Utilized NEI 17-01, “Industry Guideline for Implementing the Requirements of 10 CFR Part 54 for Subsequent License Renewal,” Revision 0
- Comprehensive Scoping & Screening was performed
- Aging Management Reviews (AMRs)
 - Identification of Potential Aging Effects
 - Identification of Aging Effects Requiring Management
 - Review of Operating and Maintenance History
 - Identification of Aging Management Programs
- Aging Management Programs (AMPs)
 - Goal is to maximize consistency with GALL-SLR
- Time Limited Aging Analyses (TLAAs)
 - Keyword search of licensing basis documents to identify potential TLAAs
 - Comparison of the Dresden identified potential TLAAs to SLR guidance documents
 - Comparison of the Dresden identified potential TLAAs to other SLR applicants
 - Review of applicable BWRVIP documents
- Operating Experience
 - Initial review period: 01/01/2013 through 12/12/2022; will perform gap review prior to submittal.
 - No new aging effects identified to date

10 CFR Part 54 Safety Application Approach

AMPs applicable to Dresden Nuclear Power Station⁽¹⁾

- DNPS will have 47 AMPs
 - 35 are existing programs
 - 24 existing programs will be enhanced for SLR purposes
 - 12 are new programs
 - No site-specific AMPs

- AMPs Not Applicable to Dresden Nuclear Power Station⁽¹⁾ (does not include PWR specific AMPs)
 - X.S1, Concrete Containment Unbonded Tendon Prestress
 - XI.M22, Boraflex Monitoring
 - XI.S2, ASME Section XI Subsection IWL
 - XI.E5, Fuse Holders

(1) – Preliminary Information

10 CFR Part 54 Safety Application Approach

Preliminary AMP results:

		AMPs Consistent with GALL-SLR	AMPs with Enhancements	AMPs with Exception without Enhancement	AMPs with Exception and Enhancement	Plant Specific AMPs
Existing	35	9	18	2	6	0
New	12	9	N/A	3	N/A	0
Total AMPs	47					

Lessons Learned

- Lessons learned from previous Constellation and industry license renewal projects are being utilized in the DNPS SLRA Project
 - Constellation has extensive aging management experience
 - 20 of 21 units have renewed operating licenses
 - 12 units are operating in the period of extended operation
 - Constellation participates in NEI and EPRI initiatives related to License Renewal & Long-Term Operations
 - The Constellation DNPS SLRA Project Team consists of experienced technical personnel
- Current NRC Expectations and Guidance
 - Constellation reviews Breakout Questions, RAIs/RCIs, and Supplements associated with recent license renewal applications to ensure consistency with current NRC expectations and SRP guidance
- An Industry Peer Review of the SLRA will be performed

Project Management

- Constellation plans to submit the SLRA, including the Environmental Report (ER), via the NRC Electronic Information Exchange (EIE)
- Constellation intends to utilize the Sciencetech eDocs portal to support NRC review. Documents such as:
 - SLRA, ER, boundary drawings, UFSAR, and FPP will be available on the eDocs portal.
- Constellation Licensing Lead will coordinate with the NRC PM
- Audit Support
 - Constellation will work with the NRC PM to establish and manage the schedules
 - Constellation will track NRC audit questions, requests, and the responses in a database
 - Site lead will coordinate plant walkdowns and other on-site activities
- RAI Responses
 - Constellation will submit timely responses to NRC requests for additional information

Schedule and Closing Remarks

- The DNPS SLR application will be consistent with GALL-SLR to the greatest extent possible
- The DNPS SLR application will be consistent with industry practices and lessons learned from recent LRs/SLRs to meet NRC requirements
- Constellation will submit a high-quality application that can support an efficient staff review
 - Recent industry RAIs will be addressed in the SLR application
 - Timely RAI responses
 - Frequent NRC interface
- The DNPS SLR application is on track to be submitted on the target date of April 17, 2024

Questions

