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

May 14, 2024

LICENSEE: Constellation Energy Generation, LLC

FACILITY: Braidwood Station, Units 1 and 2, Byron Station, Units 1 and 2, Calvert Cliffs Nuclear Power Plant, Units 1 and 2, Clinton Power Station, Unit 1, 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, Nine Mile Point Nuclear Station, Units 1 and 2, Peach Bottom Atomic Power Station, Units 2 and 3, Quad Cities Nuclear Power Station, Units 1 and 2, R.E. Ginna Nuclear Power Plant

SUBJECT: SUMMARY OF APRIL 11, 2024, PUBLIC MEETING WITH CONSTELLATION ENERGY GENERATION, LLC REGARDING PROPOSED ALTERNATIVE TO IMPLEMENT AMERICAN SOCIETY OF MECHANICAL ENGINEERS OPERATION AND MAINTENANCE CODE CASE OMN-32 (EPID L-2024-LRM-0050)

On April 11, 2024, a public meeting via webinar was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Constellation Energy Generation, LLC (Constellation). The purpose of the meeting was to discuss a potential fleet request to use American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) Code Case OMN-32, “Alternative Requirements for Range and Accuracy of Pressure, Flow, and Differential Pressure Instruments Usen in Pump Tests” for Braidwood Station, Units 1 and 2; Byron Station, Units 1 and 2; Calvert Cliffs Nuclear Power Plant, Units 1 and 2; Clinton Power Station, Unit 1; 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; Nine Mile Point Nuclear Station, Units 1 and 2; Peach Bottom Atomic Power Station, Units 2 and 3; Quad Cities Nuclear Power Station, Units 1 and 2; and R.E. Ginna Nuclear Power Plant. The meeting notice and agenda, dated March 28, 2024, are available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML24101A222. The presentation material used by the licensee during the meeting is available at ML24100A767. A list of attendees is enclosed.

During the meeting, Constellation presented information regarding the planned alternative. Constellation discussed the following topics as part of its presentation:

- Alternative:

  Constellation discussed the type of alternative that they plan to submit which will be pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55(a)(z), “Alternatives to codes and standards requirements,” to utilize ASME OM Code Case OMN-32. ASME OM Code Case OMN-32 provides alternative testing instrument accuracy and range requirements for flow, pressure, and differential pressure instruments used to Group A, B, comprehensive, and preservice pump tests. ASME OM

Code Case OMN-32 is not applicable for instruments measuring speed and vibration and will continue to meet the existing instrument accuracy and range requirements in ASME OM Code. Constellation stated that ASME OM Code Case OMN-32 would be an alternative for all pumps in the inservice testing (IST) program at each of Constellation's 21 units. Constellation stated that implementation of ASME OM Code Case OMN-32 would allow sites to utilize permanently installed plant instrumentation to support pump testing which would eliminate the need to install temporary instruments reducing dose and person-hours.

Constellation stated that the most recent IST program plan will be submitted for each plant in the submittal to specify pumps within the scope of the request for each plant.

- Submittal and Precedent:

  Constellation stated that they are targeting submittal by the end of April 2024 with a plan to request approval in 1 year from the date of submittal. Constellation stated that the submittal will be the first in the industry for an alternative to utilize ASME OM Code Case OMN-32.

The NRC staff provided feedback on the following topics:

- Constellation should include all the applicable NRC-approved alternative requests related to the pumps' accuracy requirements within the scope of the request for each plant.

- ASME OM Code Case OMN-32 is not accepted in Regulatory Guide 1.192, "Operation and Maintenance Code Case Acceptability, ASME OM Code" (ML21181A223), yet so the licensee will need to justify as plant-specific alternative for each applicable plant.

- Constellation should review the applicable ASME OM Code edition for each plant for differences in accuracy requirements, and pump testing requirements (such as baseline and periodic pump verification testing).

- The statement that "analytical methods" will be used is outside the scope of ASME OM Code Case OMN-32 because, when the NRC staff submitted a comment proposing that the proposed Code Case be revised to include this approach, ASME stated that such a change would require a new ballot. Therefore, the use of "analytical methods" is a deviation from ASME OM Code Case OMN-32 and should be justified separately from the justification for the use of the ASME OM Code Case OMN-32 approach.

- The submittal should specify that the speed and vibration accuracy requirements in the ASME OM Code continue to apply regardless of proposed alternatives.

- The submittal should specify 10 CFR 50.55a(z)(1) alternative request rather than relief request under 10 CFR 50.55a(f).

No regulatory decisions were made during the meeting. No members of the public were in attendance. No comments or questions from the public were received during the meeting.

Please direct any inquiries regarding this meeting summary to Luis Cruz Rosado at luis.cruzrosado@nrc.gov or to me at robert.kuntz@nrc.gov.

Sincerely,

/RA/

Robert F. Kuntz, Senior Project Manager
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-456, 50-457,
50-454, 50-455, 50-317,
50-318, 50-461, 50-237,
50-249, 50-333, 50-244,
50-373, 50-374, 50-352,
50-353, 50-220, 50-410,
50-277, 50-278, 50-254,
and 50-265

Enclosure:
List of Attendees

cc: Listserv

SUBJECT: SUMMARY OF APRIL 11, 2024, PUBLIC MEETING WITH CONSTELLATION ENERGY GENERATION, LLC REGARDING PROPOSED ALTERNATIVE TO IMPLEMENT AMERICAN SOCIETY OF MECHANICAL ENGINEERS OPERATION AND MAINTENANCE CODE CASE OMN-32 (EPID L-2024-LRM-0050) DATED MAY 14, 2024

DISTRIBUTION:

PUBLIC
RidsNrrDorl Resource
RidsNrrDorlLpl1 Resource
RidsNrrDorlLpl3 Resource
RidsRgn1MailCenter Resource
RidsRgn3MailCenter Resource
RidsNrrLASRohrer Resource
RidsNrrLASLent Resource
RidsNrrLAKZeleznock Resource
RidsNrrLAKEntz Resource
RidsAcrs_MailCTR Resource
RidsNrrPMConstellation Resource
RidsNrrPMBraidwood Resource
RidsNrrPMByron Resource
RidsNrrPMCalvertCliffs Resource
RidsNrrPMClinton Resource
RidsNrrPMDresden Resource
RidsNrrPMFitzPatrick Resource
RidsNrrPMLaSalle Resource
RidsNrrPMLimerick Resource
RidsNrrPMNineMilePoint Resource
RidsNrrPMPeachBottom Resource
RidsNrrPMQuadCities Resource
RidsNrrPMREGinna Resource
TScarbrough, NRR
LCruzRosado, NRR

ADAMS Accession No.: ML24128A251 **NRC-001**

OFFICE	NRR/DORL/LPL3/PM	NRR/DORL/LPL3/LA	NRR/DORL/LPL3/BC	NRR/DORL/LPL3/PM
NAME	LCruzRosado	SRohrer	JWhited	RKuntz
DATE	5/7/2024	5/8/2024	5/9/2024	5/14/2024

OFFICIAL RECORD COPY

LIST OF ATTENDEES

APRIL 11, 2024, PUBLIC MEETING WITH CONSTELLATION ENERGY GENERATION

REGARDING PROPOSED ALTERNATIVE TO IMPLEMENT CODE CASE OMN-32

Name	Organization
Luis Cruz Rosado	Nuclear Regulatory Commission (NRC)
Audrey Klett	NRC
Elena Herrera Torres	NRC
Jeffrey Whited	NRC
Michael Marshall	NRC
Robert Kuntz	NRC
Scott Wall	NRC
Surinder Arora	NRC
Thomas Scarbrough	NRC
Wendi Para	Constellation Energy Generation, LLC (CEG)
Joshua Crow	CEG
Glenn Weiss	CEG
Fredrick Sarantakos	CEG
Charles Parker	CEG
Peter Uzokwe	CEG
Casey Vander Bleek	CEG
Ted Ryan	CEG

Enclosure