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

December 19, 2024

David P. Rhoades
Senior Vice President
Constellation Energy Generation, LLC
President and Chief Nuclear Officer
Constellation Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: BRAIDWOOD STATION, UNITS 1 AND 2; BYRON STATION, UNIT NOS. 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 – ALTERNATIVE REQUEST TO USE AMERICAN SOCIETY OF MECHANICAL ENGINEERS BOILER AND PRESSURE VESSEL CODE CASE OMN-32 (EPID L-2024-LLR-0030)

Dear David P. Rhoades:

By letter dated April 30, 2024 (Agencywide Documents Access and Management System Accession No. ML24122C614), as supplemented by letter dated October 10, 2024 (ML24284A313), Constellation Energy Generation, LLC (CEG, the licensee) submitted requests for Braidwood Station, Units 1 and 2 (Braidwood); Byron Station, Unit Nos. 1 and 2 (Byron); Calvert Cliffs Nuclear Power Plant, Units 1 and 2 (Calvert Cliffs); Clinton Power Station, Unit 1 (Clinton); Dresden Nuclear Power Station, Units 2 and 3 (Dresden); James A. Fitzpatrick Nuclear Power Plant (Fitzpatrick); Lasalle County Station, Units 1 and 2 (Lasalle); Limerick Generating Station, Units 1 and 2 (Limerick); Nine Mile Point Nuclear Station, Units 1 and 2 (NMP); Peach Bottom Atomic Power Station, Units 2 and 3 (Peach Bottom); Quad Cities Nuclear Power Station, Units 1 and 2 (Quad Cities); and R.E. Ginna Nuclear Power Plant (Ginna) (collectively, the CEG facilities) for the use of an alternative to specific inservice testing (IST) requirements in the 2004 Edition with 2006 Addenda through 2017 Edition of the American Society of Mechanical Engineers (ASME) Operation and Maintenance of Nuclear Power Plants, *D*ivision 1, OM Code: Section IST (OM Code), as applicable, for the IST programs at the CEG facilities.

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) section 50.55a(z)(1), “Acceptable level of quality and safety,” the licensee requested to implement Constellation Fleet Alternative Request to utilize ASME OM Code Case OMN-32, “Alternative Requirements for Range and Accuracy of Pressure, Flow, and Differential Pressure Instruments Used in Pump Tests,” on the basis that the proposed alternative would provide an acceptable

level of quality and safety in lieu of certain requirements in the ASME OM Code as incorporated by reference in 10 CFR 50.55a, “Codes and standards.”

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the subject request and concludes, as set forth in the enclosed safety evaluation, that CEG has adequately addressed the requirements in 10 CFR 50.55a(z)(1). Therefore, the NRC staff approves the use of Code Case OMN-32 for Braidwood, Byron, Calvert Cliffs, Clinton, Dresden, Fitzpatrick, Lasalle, Limerick, NMP, Peach Bottom, Quad Cities, and Ginna. For each facility, this approval is for the remainder of the current 10-year IST interval.

All other requirements in the ASME OM Code for which relief was not specifically requested and approved in this request remains applicable.

If you have any questions, please contact the Senior Project Manager, Scott Wall, at 301-415-2855 or e-mail at Scott.Wall@nrc.gov.

Sincerely,

ILKA BERRIOS

Digitally signed by ILKA BERRIOS
Date: 2024.12.19 12:43:40 -05'00'

Ilka Berrios, Acting Chief
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

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

Enclosure:
Safety Evaluation

cc: Listserv

UNITED STATES
NUCLEAR REGULATORY COMMISSION
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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

ALTERNATIVE REQUEST TO UTILIZE

THE AMERICAN SOCIETY OF MECHANICAL ENGINEERS CODE CASE OMN-32

CONSTELLATION ENERGY GENERATION, LLC

BRAIDWOOD STATION, UNITS 1 AND 2

BYRON STATION, UNIT NOS. 1 AND 2

CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2

CLINTON POWER STATION, UNIT NO. 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

DOCKET NOS. STN 50-456, STN 50-457, STN 50-454, STN 50-455, 50-317, 50-318, 50-461, 50-237, 50-249, 50-333, 50-373, 50-374, 50-352, 50-353, 50-220, 50-410, 50-277, 50-278, 50-254, 50-265, AND 50-244

Enclosure

1.0 INTRODUCTION

By letter dated April 30, 2024 (Agencywide Documents Access and Management System Accession No. ML24122C614), as supplemented by letter dated October 10, 2024 (ML24284A313), Constellation Energy Generation, LLC (CEG, the licensee) submitted requests for Braidwood Station, Units 1 and 2 (Braidwood); Byron Station, Unit No. 1 and 2 (Byron); Calvert Cliffs Nuclear Power Plant, Units 1 and 2 (Calvert Cliffs); Clinton Power Station, Unit 1 (Clinton); Dresden Nuclear Power Station, Units 2 and 3 (Dresden); James A. Fitzpatrick Nuclear Power Plant (Fitzpatrick); Lasalle County Station, Units 1 and 2 (Lasalle); Limerick Generating Station, Units 1 and 2 (Limerick); Nine Mile Point Nuclear Station, Units 1 and 2 (NMP); Peach Bottom Atomic Power Station, Units 2 and 3 (Peach Bottom); Quad Cities Nuclear Power Station, Units 1 and 2 (Quad Cities); and R.E. Ginna Nuclear Power Plant (Ginna) (collectively, the CEG facilities) for the use of an alternative to specific inservice testing (IST) requirements in the 2004 Edition with 2006 Addenda through 2017 Edition of the American Society of Mechanical Engineers (ASME) Operation and Maintenance of Nuclear Power Plants, *D*ivision 1, OM Code: section IST (OM Code), as applicable, for the IST Programs at the CEG facilities.

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) section 50.55a(z)(1), "Acceptable level of quality and safety," the licensee requested to implement Constellation Fleet Alternative Request to utilize ASME OM Code Case OMN-32, "Alternative Requirements for Range and Accuracy of Pressure, Flow, and Differential Pressure Instruments Used in Pump Tests," on the basis that the proposed alternative would provide an acceptable level of quality and safety in lieu of certain requirements in the ASME OM Code as incorporated by reference in 10 CFR 50.55a, "Codes and standards."

2.0 REGULATORY EVALUATION

The U.S. Nuclear Regulatory Commission (NRC) regulations in 10 CFR 50.55a(f)(4), "Inservice testing standards requirement for operating plants," state, in part:

> Throughout the service life of a boiling or pressurized water-cooled nuclear power facility, pumps and valves that are within the scope of the ASME OM Code must meet the IST requirements (except design and access provisions) set forth in the ASME OM Code and addenda that become effective subsequent to editions and addenda specified in 10 CFR 50.55a(f)(2) and (3) and that are incorporated by reference in 10 CFR 50.55a(a)(1)(iv), to the extent practical within the limitations of design, geometry, and materials of construction of the components.

The regulations in 10 CFR 50.55a(z) state, in part, that alternatives to the requirements in paragraphs (b) through (h) of 10 CFR 50.55a may be authorized by the NRC if the licensee demonstrates that: (1) the proposed alternative provides an acceptable level of quality and safety, or (2) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

The NRC regulations in 10 CFR 50.55a(b)(6), "Conditions on ASME OM Code Cases," state that licensees may apply the ASME OM Code Cases listed in NRC Regulatory Guide (RG) 1.192, as incorporated by reference in 10 CFR 50.55a(a)(iii), without prior NRC approval.

RG 1.192, “Operation and Maintenance Code Case Acceptability, ASME OM Code,” Revision 5, dated March 2024 (ML23291A006), states, in part:

> Under 10 CFR 50.55a(z), a licensee or applicant may request authorization to use OM Code Cases that the NRC has not yet endorsed. That section permits the use of alternatives to the OM Code requirements referenced in 10 CFR 50.55a, provided that the proposed alternatives result in an acceptable level of quality and safety and their use is authorized by the Director of the Office of Nuclear Reactor Regulation.

3.0 TECHNICAL EVALUATION

The information provided by the licensee in support of the request for an alternative to ASME OM Code requirements, as incorporated by reference in 10 CFR 50.55a, has been evaluated and the bases for NRC staff’s conclusion are documented below.

3.1 Licensee’s Alternative Request to Utilize Code Case OMN-32

3.1.1 Components for Which the Subsequent Code Edition is Requested

The scope of this alternative request includes all pumps listed in the IST program plan for each CEG facility listed Table 1 below (Notes 1 and 2 are as provided in Table 2 of the April 30, 2024, submittal).

3.1.2 Current Code Edition and Addenda of Record

The application identified the currently applicable editions and addenda of the ASME OM Code, for each plant, as shown in Table 1 below. In addition, Table 1 shows the associated 10-year ISI interval including the start and end dates for each plant.

Table 1: Current ASME OM Code of Record, IST Interval, and IST Program

Station	Code in Effect	Interval	Start of Interval	End of Interval	IST Program Transmittal
Braidwood Station, Units 1 and 2	OM-2012 Edition	Fourth	7/29/2018	7/28/2028	ML21118A011
Byron Station, Units 1 and 2	OM-2004 Edition, 2006 Add.	Fourth	7/1/2016	6/30/2026	ML16203A108[1]
Calvert Cliffs Nuclear Power Plant, Units 1 and 2	OM-2012 Edition	Fifth	7/1/2018	6/30/2028	ML18192B990
Clinton Power Station, Unit 1	OM-2012 Edition	Fourth	7/1/2020	6/30/2030	ML23352A033
Dresden Nuclear Power Station, Units 2 and 3	OM-2017 Edition	Sixth	11/1/2023	10/31/2033	ML23334A181
James A. FitzPatrick Nuclear Power Plant	OM-2004 Edition, 2006 Add.	Fifth	6/1/2018	9/30/2027	ML18218A533

Station	Code in Effect	Interval	Start of Interval	End of Interval	IST Program Transmittal
LaSalle County Station, Units 1 and 2	OM-2004 Edition, 2006 Add.	Fourth	10/12/2017	10/11/2027	ML18200A080 ML18200A087
Limerick Generating Station, Units 1 and 2	OM-2012 Edition	Fourth	1/8/2020	1/7/2030	ML20265A060[2]
Nine Mile Point Nuclear Station, Unit 1	OM-2012 Edition	Fifth	1/1/2019	12/31/2028	ML19072A182
Nine Mile Point Nuclear Station, Unit 2	OM-2012 Edition	Fifth	1/1/2019	12/31/2028	ML19072A182
Peach Bottom Atomic Power Station, Units 2 and 3	OM-2012 Edition	Fifth	11/16/2018	8/14/2028	ML18337A196
Quad Cities Nuclear Power Station, Units 1 and 2	OM-2017 Edition	Sixth	8/18/2023	7/17/2033	ML23249A097
R.E. Ginna Nuclear Power Plant	OM-2012 Edition	Sixth	1/1/2020	12/31/2029	ML20036C593

Note 1: The Inservice Testing Pump Table is provided in ML16203A108; however, it does not follow Attachment 12, Inservice Testing Pump Table, cover page as expected. The Inservice Testing Pump Table was inadvertently inserted at the end of Attachment 14, Inservice Testing Valve Table, and starts on PDF, pages 238 of 247.

Note 2: The referenced submittal is the latest one on the docket but was provided after the submittal for the IST program plan 10-year interval update.

3.1.3 Applicable Code Requirements

The IST requirements in the ASME OM Code, 2004 Edition with 2006 Addenda through 2017 Edition, as incorporated by reference in 10 CFR 50.55a related to this alternative request, are as follows:

- ASME OM Code, subsection ISTB, “Inservice Testing of Pumps in Water-Cooled Reactor Nuclear Power Plants,” [title includes Pre-2000 Plants in OM Code, 2012 through 2017 Editions], paragraph ISTB-3500, “Data Collection,” paragraph ISTB-3510, “General,” subparagraph (b), “Range,” Item (1), states that the full-scale range of each analog instrument shall be not greater than three times the reference value.

- ASME OM Code, subsection ISTB, subparagraph ISTB-3510(a), “Accuracy,” states, in part, that instrument accuracy shall be within the limits of table ISTB-3510-1, “Required Instrument Accuracy.” Subparagraph ISTB-3510(a) also states that if a parameter is determined by analytical methods instead of measurement, then the determination shall meet the parameter accuracy requirements of table ISTB-3510-1 (e.g., flow rate determination shall be accurate to within ± 2 percent of actual). For individual analog

instruments, the required accuracy is percent of full-scale. For digital instruments, the required accuracy is over the calibrated range. For a combination of instruments, the required accuracy is loop accuracy.

- ASME OM Code, subsection ISTB, subparagraph ISTB-3510(b), "Range," Item (1) states that full-scale range of each analog instrument shall not be greater than three times the reference values. Item (2) states digital instruments shall be selected such that the reference values do not exceed 90 percent (OM Code-2004 Edition with 2006 Addenda through 2020 Edition) of the calibrated range of instrument.

- ASME OM Code-2004 with 2006 Addenda through 2017 Edition, subsection ISTB, table ISTB-3510-1, "Required Instrument Accuracy," provides the Pressure, Flow Rate, Speed, Vibration and Differential Pressure instrument accuracy requirement for Group A, Group B, Comprehensive, and Preservice Tests."

3.1.4 Licensee's Proposed Alternative

The licensee proposed to adopt the ASME Board of Nuclear Codes and Standards (BNCS)-Approved OM Code Case OMN-32, "Alternative Requirements for Range and Accuracy of Pressure, Flow, and Differential Pressure Instrument Used in Pump Tests." This Code Case was approved by the ASME OM Code Standards published in September 2013. The proposed alternative will be applied for the entire or remaining 10-year interval and will apply to pressure, flow and differential pressure instrumentation of the ASME OM Code for testing all pumps contained within the IST program scope of the Constellation nuclear power plants listed in Table 1 above.

Code Case OMN-32 as available on the ASME website (as of October 2, 2024):

Code Case OMN-32
Alternative Requirements for Range and Accuracy of Pressure, Flow, and Differential Pressure Instruments Used in Pump Tests

Inquiry: What alternative to the requirements of ISTB-3510(a) and ISTB-3510(b) for the accuracy and range of flow, pressure, and differential pressure instruments may be used for Group A, Group B, Comprehensive, and Preservice pump tests?

Reply: It is the opinion of the Committee that in lieu of ISTB-3510(a), ISTB-3510(b), and Table ISTB 3510-1, the following requirements may be applied to instruments used to measure pump pressure, flow rate, and differential pressure.

Applicability: See Applicability Index (ASME OM Code 2001 through 2020 Edition)

1. Required Instrument Accuracy

(a) *Accuracy.* The analog or digital instrument(s) shall be calibrated within the limits specified in Table 1 for the respective test quantity. For an instrument loop, the required accuracy is instrument loop accuracy as defined in ISTA-2000.

(b) *Range.* The analog or digital instrument(s) shall be designed and calibrated in the range for use at the expected reading (e.g., reference value) to be measured or recorded during the test.

Table 1 Required Instrument Accuracy

Quantity	Group A and Group B Tests, Percent of Reading	Comprehensive and Preservice Tests % of Reading
Pressure	± 6	± 1½
Flow rate	± 6	± 6
Differential pressure	± 6	± 1½

Note: ISTB-3510(b)(3) pertains to vibration instruments and is not covered by Code Case OMN-32 or included in this alternative request.

3.1.4 Licensee's Reason for Request

In the April 30, 2024, application, the licensee indicated that it considers the use of Code Case OMN-32 to be an alternative that provides an acceptable level of quality and safety in lieu of the requirements of the applicable editions and addenda of the ASME OM Code, subsection ISTB, subparagraphs ISTB-3510(a) and ISTB-3510(b), and Table ISTB 3510-1 for the accuracy and range of flow, pressure, and differential pressure instruments used for Group A, Group B, Comprehensive, and Preservice pump tests, at the CEG facilities.

3.2 Staff Evaluation

ASME OM Code, subsection ISTB, paragraphs ISTB-3510(a) and (b), and table ISTB-3510-1, specify the required instrument accuracy for Group A, Group B, Preservice, and Comprehensive Pump tests. Subparagraph ISTB-3510(b)(1) requires that the full-scale range of each instrument be no greater than three times the reference value. Subparagraph ISTB-3510(b)(2) requires that Digital instruments shall be selected such that the reference values do not exceed 90 percent (OM Code-2004 Edition with 2006 Addenda through 2020 Edition) of the calibrated range of instrument.

The licensee proposed an alternative to use Code Case OMN-32 in lieu of the ASME OM Code, ISTB-3510(a), ISTB-3510(b), and Table ISTB-3510-1 requirements of instrument accuracy for pumps in the IST program at the CEG facilities listed in Table 1 above.

Code Case OMN-32 was approved by the ASME Operation and Maintenance Standards Committee in September 2023, with the NRC representative voting in the affirmative with comments. Code Case OMN-32 was subsequently made available on the ASME website. Regulation 10 CFR 50.55a(b)(6) does allow licensees to apply the ASME OM Code Cases listed in RG 1.192 without prior NRC approval. However, the NRC has not yet endorsed Code Case OMN-32 in RG 1.192.

RG 1.192, Revision 5, states, in part, that under 10 CFR 50.55a(z), a licensee or applicant may request authorization to use OM Code Cases that the NRC has not yet endorsed. In the October 10, 2024, supplement, the licensee provided additional information to address NRC

staff comments which were not incorporated in Code Case OMN-32 available on the ASME website.

In its letter dated October 10, 2024, the licensee states:

> Constellation Energy Generation, LLC (CEG) does utilize analytical methods to determine pump test parameters. However, CEG will not be utilizing American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) Code Case OMN-32 for parameters determined by analytical methods. CEG facilities will follow the OM Code requirements or pre-authorized alternatives as approved without modification when a pump test parameter is determined by analytical methods instead of measurement. CEG will include guidance in governance procedures to ensure OMN-32 is not applied to pump test parameters determined by analytical methods.

and

> All CEG facilities are committed to the 2004 / 2006 Addenda, 2012 or 2017 OM Code Editions as detailed in Table 2.1, of the Reference [April 30, 2024, submittal]. Each of the applicable OM Code Editions contain the range requirement that digital instruments shall be selected such that the reference value does not exceed 90% of calibrated range of the instrument. No CEG facilities implement earlier OM Code Editions that contain the 70% of the calibrated range requirement nor use Code Case OMN-6.
>
> CEG facilities will follow the Code Case OMN-32 Range requirement and ensure the reference value does not exceed 90% of the calibrated range of a digital instrument as required in each facilities OM Code of Record.

and

> CEG will utilize Code Case OMN-32 as an option when implementing LaSalle's RP-04 and Limerick's 11-PRR-1 existing approved Alternative Requests.
>
> LaSalle Alternative Request RP-04 was approved to utilize Code Case OMN-19, "Alternative Upper Limit for the Comprehensive Pump Test." Code Case OMN-19 provides an option that a multiplier of 1.06 times the reference value may be used in lieu of the 1.03 multiplier for the comprehensive pump test's upper "Acceptable Range" criteria and "Required Action Range, High" criteria referenced in the ISTB test acceptance criteria tables as listed in Code Case OMN-19, Table 1. Code Case OMN-19 does not alter the OM Code test instrumentation requirements. Code Case OMN-32 has been determined to have equivalent instrument requirements to the existing OM Code requirement and therefore application of Code Case OMN-32 does not impact LaSalle's approved Alternative Request RP-04.
>
> Limerick Alternative Request 11-PRR-1 was approved to utilize Code Case OMN-16, Revision 1, "Use of a Pump Curve for Testing." Code Case OMN-16 provides an option to use a reference curve and acceptance criteria in lieu of a single reference point when system flow is impractical to adjust to a specific

reference value. Code Case OMN-16 does not alter the OM Code test instrumentation requirements. Code Case OMN-32 has been determined to have equivalent instrument requirements to the existing OM Code requirement and therefore application of Code Case OMN-32 does not impact Limerick's approved Alternative Request 11-PRR-1.

The NRC staff reviewed the information in the April 30, 2024, submittal and October 10, 2024, supplement, has determined that the licensee has addressed the comments that the NRC expressed when voting to affirm OMN-32. Based on the review of the alternative request, as supplemented, the NRC staff has determined that the implantation of ASME OM Code Case OMN-32 for the pumps in the IST programs for the CEG facilities will provide reasonable assurance of the accuracy and range of flow, pressure, and differential pressure instruments used for pump tests. Therefore, the NRC staff finds that the implementation of the proposed alternatives at the CEG facilities provides an acceptable level of quality and safety in accordance with 10 CFR 50.55a(z)(1).

4.0 CONCLUSION

As set forth above, the NRC staff finds that the proposed alternatives described in in the April 30, 2024, submittal and October 10, 2024, supplement, to implement ASME OM Code Case OMN-32, with the additional information described in the October 10, 2024, provide an acceptable level of quality and safety for the pumps in the IST programs for the CEG facilities listed in Table 1 above. Accordingly, the NRC staff concludes that the licensee has adequately addressed the regulatory requirements set forth in 10 CFR 50.55a(z)(1). Therefore, the NRC staff authorizes the licensee to use the proposed alternative request, as supplemented, to use Code Case OMN-32 at Braidwood, Units 1 and 2, Byron, Unit Nos. 1 and 2, Calvert Cliffs, Units 1 and 2, Clinton, Unit 1, Dresden, Units 2 and 3, Fitzpatrick, Lasalle, Units 1 and 2, Limerick, Units 1 and 2, Nine Mile Point, Units 1 and 2, Peach Bottom, Units 2 and 3, Quad Cities, Units 1 and 2, and Ginna. For each facility, this approval is for the remainder of the current 10-year IST program, as listed in Table 1 above.

All other ASME OM Code requirements, as incorporated by reference in 10 CFR 50.55a, for which relief or an alternative was not specifically requested, and granted or authorized (as appropriate), in the subject request remain applicable.

Principal Contributor: Gurjendra Bedi, NRR/DEX/EMIB
Thomas Scarbrough, NRR/DEX/EMIB

Date: December 19, 2024

SUBJECT: BRAIDWOOD STATION, UNITS 1 AND 2; BYRON STATION, UNITNOS. 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 – ALTERNATIVE REQUEST TO USE AMERICAN SOCIETY OF MECHANICAL ENGINEERS BOILER AND PRESSURE VESSEL CODE CASE OMN-32 (EPID L-2024-LLR-0030) DATED DECEMBER 19, 2024

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