Exelon Generation®

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10 CFR 50.55a

RS-19-055
NMP1L3279
TMI-19-045

May 1, 2019

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

Braidwood Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and STN 50-457

Byron Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. STN 50-454 and STN 50-455

Calvert Cliffs Nuclear Power Plant, Units 1 and 2
Renewed Facility Operating License Nos. DPR-53 and DPR-69
NRC Docket Nos. 50-317 and 50-318

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

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

James A. FitzPatrick Nuclear Power Plant
Renewed Facility Operating License No. DPR-59
NRC Docket No. 50-333

LaSalle County Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Limerick Generating Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

Nine Mile Point Nuclear Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-63 and NPF-69
NRC Docket Nos. 50-220 and 50-410

Peach Bottom Atomic Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277 and 50-278

Quad Cities Nuclear Power Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

R. E. Ginna Nuclear Power Plant
Renewed Facility Operating License No. DPR-18
NRC Docket No. 50-244

Three Mile Island Nuclear Station, Unit 1
Renewed Facility Operating License No. DPR-50
NRC Docket No. 50-289

Subject: Response to Request for Additional Information - Proposed Alternatives to Utilize Code Cases N-878 and N-880

References:

1) Letter from J. Barstow (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Proposed Alternative to Utilize Code Cases N-878 and N-880," dated May 30, 2018

2) Letter from B. Purnell (U.S. Nuclear Regulatory Commission) to B. Hanson (Exelon Generation Company, LLC), Supplemental Information Needed for Acceptance of Requests to Use ASME Code Cases N-878, N-879, and N-880, dated July 10, 2018

3) Letter from J. Barstow (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Proposed Alternatives to Utilize Code Cases N-878, N-879, and N-880," dated July 26, 2018

4) Email from B. Purnell (U.S. Nuclear Regulatory Commission) to T. Loomis (Exelon Generation Company, LLC), "Exelon Generation Company, LLC - Fleet Request to use ASME Code Cases N-878 and N-880 (EPID L-2018-LLR-0077)," dated December 11, 2018

5) Letter from J. Barstow (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Response to Request for Additional Information - Proposed Alternative to Utilize Code Cases N-878 and N-880," dated January 8, 2019

6) Email from B. Purnell (U.S. Nuclear Regulatory Commission) to T. Loomis (Exelon Generation Company, LLC), "Exelon Generation Company, LLC - Fleet Request to use ASME Code Cases N-878 and N-880 (EPID L-2018-LLR-0077)," dated April 24, 2019

In the Reference 1 letter, in accordance with 10 CFR 50.55a(z)(2), Exelon Generation Company, LLC (Exelon) requested proposed alternatives to the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," on the basis that compliance with the code results in hardship without a compensating increase in quality. Specifically, these proposed alternatives requested the use of Code Case N-878 ("Alternative to QA Program Requirements of IWA-4142 Section XI, Division 1") and N-880 ("Alternative to Procurement Requirements of IWA-4143 for Small Nonstandard Welded Fittings Section XI, Division 1"), which address the procurement of material from a material supplier that does not possess ASME accreditation as a Quality System Certificate Holder or an NPT Certificate Holder.

In the Reference 6 email, the U.S. Nuclear Regulatory Commission requested additional information. Attached is our response.

There are no regulatory commitments contained in this letter.

If you have any questions, please contact Tom Loomis (610) 765-5510.

Respectfully,

David T. Gudger
Manager - Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Attachment: Response to Request for Additional Information - Proposed Alternative to Utilize Code Cases N-878 and N-880

cc: Regional Administrator - NRC Region I
Regional Administrator - NRC Region III
NRC Senior Resident Inspector - Braidwood Station
NRC Senior Resident Inspector - Byron Station
NRC Senior Resident Inspector - Calvert Cliffs Nuclear Power Plant
NRC Senior Resident Inspector - Clinton Power Station
NRC Senior Resident Inspector - Dresden Nuclear Power Station
NRC Senior Resident Inspector - James A. FitzPatrick Nuclear Power Plant
NRC Senior Resident Inspector - LaSalle County Station
NRC Senior Resident Inspector - Limerick Generating Station
NRC Senior Resident Inspector - Nine Mile Point Nuclear Station
NRC Senior Resident Inspector - Peach Bottom Atomic Power Station

cc (continued):

NRC Senior Resident Inspector - Quad Cities Nuclear Power Station
NRC Senior Resident Inspector - R. E. Ginna Nuclear Power Plant
NRC Senior Resident Inspector - Three Mile Island Nuclear Station, Unit 1
NRC Project Manager - Braidwood Station
NRC Project Manager - Byron Station
NRC Project Manager - Calvert Cliffs Nuclear Power Plant
NRC Project Manager - Clinton Power Station
NRC Project Manager - Dresden Nuclear Power Station
NRC Project Manager - James A. FitzPatrick Nuclear Power Plant
NRC Project Manager - LaSalle County Station
NRC Project Manager - Limerick Generating Station
NRC Project Manager - Nine Mile Point Nuclear Station
NRC Project Manager - Peach Bottom Atomic Power Station
NRC Project Manager - Quad Cities Nuclear Power Station
NRC Project Manager - R. E. Ginna Nuclear Power Plant
NRC Project Manager - Three Mile Island Nuclear Station, Unit 1
Illinois Emergency Management Agency - Department of Nuclear Safety
R. R. Janati - Bureau of Radiation Protection, Commonwealth of Pennsylvania
D. A. Tancabel - State of Maryland
A. L. Peterson - NYSERDA

Attachment

Response to Request for Additional Information - Proposed Alternative to Utilize Code Cases N-878 and N-880

Question:

For repair/replacement activities where the construction code is Section III of the ASME BPV Code, explain how Exelon will ensure that the requirements of Section III will be met when the design and testing activities associated with the qualification of non-welded and welded fittings is performed by a fabricator that does not have a QA program in accordance with Appendix B to 10 CFR Part 50, NQA-1, or ASME Certificate of Authorization. The response should address: (1) review of design documentation; (2) the performance of the fabricator's qualification testing of fittings used to ensure compliance with the Owner's design specifications and paragraphs NB/NC/ND-3671.7 of ASME BPV Code, Section III; and (3) Authorized Nuclear Inservice Inspector involvement.

Response:

The subject of the relief request is material procurement and fabrication by an organization not holding ASME accreditation or a 10 CFR 50, Appendix B Quality Assurance Program. The relief request does not ask for any relief from compliance with NB/NC/ND-3671.7 or any other Section III design requirement or any Appendix B design or test control requirement. These requirements will be met by Exelon as they would for any design activity. Piping system and fitting design activities will be performed or supervised only by appropriately-qualified suppliers. Exelon will be responsible for preparation and review of the design documentation for the use of the fittings. Exelon will either perform the piping system design applicable to use of the fittings or will commission a vendor qualified in accordance with 10 CFR 50, Appendix B to perform this design, in accordance with all applicable Section III design requirements, including those of NB/NC/ND-3671.7. The piping system designer will be responsible for verification and acceptance of applicable prototype qualification test results, in accordance with NB/NC/ND-3671.7, under a Quality Assurance Program complying with 10 CFR 50, Appendix B, Criterion III. The designer will be responsible for ensuring that prototype qualification test results comply with 10 CFR 50, Appendix B, Criterion XI. As required by Section XI, IWA-4170, the Authorized Nuclear Inservice Inspector will be given an opportunity to review the design activities, including verification of design documents, including prototype fitting test data, by reviewing the records at or before the time at which the piping systems containing the fittings are returned to service.