

10 CFR 50.55a

RS-20-110

September 2, 2020

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

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Later Addenda of the ASME B&PV Code, Section XI
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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

Subject: Request to Use Provisions of a Later Edition of the ASME Boiler and Pressure Vessel Code, Section XI

Reference: NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," dated July 28, 2004

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(4)(iv), and the guidance provided in the referenced document, Exelon Generation Company, LLC (Exelon) requests NRC approval to use a specific provision of a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, for the units identified above. Specifically, Exelon Generation Corporation, LLC (Exelon) requests approval to use IWA-4540(b) of the 2017 Edition of the ASME B&PV Code, Section XI.

Exelon requests approval of this request by October 16, 2020. There are no regulatory commitments in this letter.

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

Respectfully,



David T. Gudger
Senior Manager, Licensing
Exelon Generation Company, LLC

Attachment: Request to Use Portions of a Later Edition of the ASME B&PV Code, Section XI

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
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station
NRC Senior Resident Inspector - R.E. Ginna Nuclear Power Plant
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
Illinois Emergency Management Agency – Division of Nuclear Safety
S. Seaman, State of Maryland
A. L. Peterson, NYSERDA

Attachment

**Request to Use Portions of a Later Edition of the
ASME B&PV Code, Section XI**

**Proposed Use of Subsequent ASME Code Edition and Addenda
In Accordance with 10 CFR 50.55a(g)(4)(iv)
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In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(4)(iv) and the guidance provided in Reference 1, Exelon Generation Company, LLC (Exelon) requests NRC approval to use specific provisions of a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, 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. Specifically, Exelon Generation Company, LLC (Exelon) requests approval to use IWA-4540(b) of the 2017 Edition of the ASME B&PV Code, Section XI.

1. Component(s) Affected

All Class 1, 2, and 3 items located in the ASME Section XI boundaries.

2. Requested Date for Approval

Approval is requested by October 16, 2020.

3. Applicable Code Edition and Addenda

<u>PLANT</u>	<u>INTERVAL</u>	<u>EDITION</u>	<u>START</u>	<u>END</u>
Braidwood Station, Units 1 and 2	Fourth	2013 Edition	August 29, 2018 October 17, 2018	July 28, 2028 October 16, 2028
Byron Station, Units 1 and 2	Fourth	2007 Edition, through 2008 Addenda	July 16, 2016	July 15, 2025
Calvert Cliffs Nuclear Power Plant, Units 1 and 2	Fifth	2013 Edition	July 1, 2019	June 30, 2029
Clinton Power Station, Unit 1	Fourth	2013 Edition	July 1, 2020	June 30, 2030
Dresden Nuclear Power Station, Units 2 and 3	Fifth	2007 Edition, through 2008 Addenda	January 20, 2013	January 19, 2023
James A. FitzPatrick Nuclear Power Plant	Fifth	2007 Edition, through 2008 Addenda	August 1, 2017	June 15, 2027
LaSalle County Stations, Units 1 and 2	Fourth	2007 Edition, through 2008 Addenda	October 1, 2017	September 30, 2027
Limerick Generating Station, Units 1 and 2	Fourth	2007 Edition, through 2008 Addenda	February 1, 2017	January 31, 2027

**Proposed Use of Subsequent ASME Code Edition and Addenda
In Accordance with 10 CFR 50.55a(g)(4)(iv)
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<u>PLANT</u>	<u>INTERVAL</u>	<u>EDITION</u>	<u>START</u>	<u>END</u>
Nine Mile Point Nuclear Station, Unit 1	Fifth	2013 Edition	August 23, 2019	August 22, 2029
Nine Mile Point Nuclear Station, Unit 2	Fourth	2013 Edition	August 23, 2018	August 22, 2028
Peach Bottom Atomic Power Station, Units 2 and 3	Fifth	2013 Edition	January 1, 2019	December 31, 2028
Quad Cities Nuclear Power Station, Units 1 and 2	Fifth	2007 Edition, through 2008 Addenda	April 2, 2013	April 1, 2023
R. E. Ginna Nuclear Power Plant	Sixth	2013 Edition	January 1, 2020	December 31, 2030

4. Proposed Subsequent Code Edition and Addenda (or Portion)

Pursuant to 10 CFR 50.55a(g)(4)(iv), Exelon requests permission to utilize IWA-4540(b) from the 2017 Edition of ASME Section XI in place of the requirements of IWA-4540(b) in the 2007 Edition through 2008 Addenda or the 2013 Edition of ASME B&PV Code, Section XI, as shown for the sites above. This subparagraph outlines items that are exempt from pressure testing after repair/replacement activities.

5. Related Requirements

10 CFR 50.55a(g)(4)(iv) states:

“Inservice examination of components and system pressure tests may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (a) of this section, subject to the conditions listed in paragraph (b) of this section, and subject to Commission approval. Portions of editions or addenda may be used, provided that all related requirements of the respective editions or addenda are met.”

10 CFR 50.55a(b)(2) incorporates by reference Section XI, Division 1, of the ASME B&PV Code 2017 Edition as approved in Reference 3. 10 CFR 50.55a(b)(2) incorporates by reference Section XI, Division 1, of the ASME B&PV Code 2017 Edition as approved in Reference 3. Exelon is requesting the use of IWA-4540(b) of the 2017 Edition of ASME Section XI to utilize the exemptions listed. There are no related requirements or applicable conditions associated with this subparagraph, IWA-4540(b).

**Proposed Use of Subsequent ASME Code Edition and Addenda
In Accordance with 10 CFR 50.55a(g)(4)(iv)
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6. Duration of Proposed Request

The duration of this request will continue for the remainder of the site's current Inservice Inspection interval.

7. References

1. NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," dated July 28, 2004.
2. U.S. Nuclear Regulatory Commission Memorandum from D. Rudland (Senior Level Advisor, Division of New and Renewed Licenses) to Anna H. Bradford (Director, Division of New and Renewed Licenses), "Summary of the June 25, 2020, Public Meeting with the Nuclear Industry to Discuss Title 10 of the Code of Federal Regulations Section 50.55a(b)(2)(xxvi) Condition on the Pressure Testing of Class 1, 2, and 3 Mechanical Joints," dated July 8, 2020 (ML20189A286)
3. Federal Register, 85 FR 26540, dated May 4, 2020

8. Precedents

- Letter from M. Markley (U.S. Nuclear Regulatory Commission) to C. Gayheart (Southern Nuclear Operating Co., Inc.), "Vogtle Electric Generating Plant, Units 1 and 2 – Request to Use a Provision of a Later Edition of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section (EPID L-2020-LLR-01 01)," dated August 6, 2020
- Letter from J. Dixon-Herrity (U.S. Nuclear Regulatory Commission) to K. Peters (Vistra Operations Company LLC), "Comanche Peak Nuclear Power Plant, Units No. 1 and 2 – Use of Later Code Edition to the Requirements of the ASME Code (EPID L-2020-LLR-0102)," dated August 17, 2020