



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

January 6, 2023

**DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3 – AUTHORIZATION AND SAFETY  
EVALUATION FOR ALTERNATIVE REQUEST I6R-10 (EPID: L-2022-LLR-0057)**

**LICENSEE INFORMATION**

**Recipient's Name and Address:** Mr. David P. Rhoades  
Senior Vice President  
Constellation Energy Generation, LLC  
President and Chief Nuclear Officer  
Constellation Nuclear  
4300 Winfield Road  
Warrenville, IL 60555

**Licensee:** Constellation Energy Generation, LLC

**Plant Name and Units:** Dresden Nuclear Power Station (Dresden), Units 2 and 3

**Docket Nos.:** 50-237 and 50-249

**APPLICATION INFORMATION**

**Submittal Date:** July 19, 2022

**Submittal Agencywide Documents Access and Management System (ADAMS) Accession  
No.:** ML22200A258

**Applicable inservice inspection (ISI) program interval and interval start/end dates:** The sixth 10-year ISI interval is scheduled to begin on January 20, 2023, and end on January 19, 2033.

**Alternative Provision:** The applicant requested an alternative under Title 10 of the *Code of Federal Regulations* (10 CFR), paragraph 50.55a(z)(1).

**Applicable Code Edition and Addenda:** American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, 2017 Edition.

**Applicable Code Requirements:** The alternative requested approval of the continued use of certain nondestructive examination (NDE) requirements of the ASME Code, Section XI, 2013 Edition in lieu of the 2017 Edition of the Code.

**Brief Description of the Proposed Alternative:** In lieu of the requirements specified in the 2017 Edition of the ASME Code, the licensee proposes to continue to use the provisions in the 2013 Edition of ASME Code, Section XI, for NDE activities associated with ISIs during the first period of the sixth ISI interval. These NDE activities are driven from ASME Code, Section XI,

Subarticles IWA-2100, IWA-2200, and IWA-2300. The licensee would comply with all applicable conditions and limitations specified in 10 CFR 50.55a(b)(2) related to the NDE requirements of the ASME Code, Section XI, 2013 Edition.

This request does not apply to the balance of the ISI program including the selection, planning, and scheduling, of ISI examinations and tests as defined in IWB-, IWC-, IWD-, IWE-, and IWF-2500 or approved ISI alternatives. Therefore, ISI examinations and tests will be selected, planned, and scheduled, in accordance with the sixth interval code of record, which will be the 2017 Edition of ASME Code, Section XI.

An inspection period is defined in ASME Code, Section XI, Table IWB-2411-1, as being the first 3 years of the 10-year inspection interval, with the option to extend the first inspection period by as much as 1 year and it may be reduced without restriction.

For additional details on the licensee's request, please refer to the documents located at the ADAMS Accession No. identified above.

### **TECHNICAL EVALUATION**

The 2013 Edition of ASME Code, section XI, is conditionally approved for use in 10 CFR 50.55a(a)(1)(ii)(C)(53). The 2013 Edition of the ASME Code, Section XI, is the basis for the ISI programs in many nuclear power plants in the United States. Extending the use of the 2013 Edition of the ASME Code, as conditioned in 10 CFR 50.55a, for an additional 3 to 4 years would have a negligible effect on safety at Dresden, Units 2 and 3. Standardizing the NDE programs across the Constellation Energy Generation fleet will help prevent compliance errors and optimize the use of internal operating experience.

### **CONCLUSION**

The Nuclear Regulatory Commission (NRC) staff has determined that the proposed alternative in the licensee's request referenced above would provide an acceptable level of quality and safety.

The NRC staff concludes that the licensee has adequately addressed the regulatory requirements set forth in 10 CFR 50.55a(z)(1).

The NRC staff authorizes the use of proposed alternative 16R-10 at Dresden, Units 2 and 3, for the first inspection period of the sixth 10-year ISI interval.

All other ASME Code, Section XI, requirements for which an alternative was not specifically requested and authorized remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

**Principal Contributor:** Stephen Cumblidge

**Date:** January 6, 2023

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Nancy L. Salgado, Chief  
Plant Licensing Branch III  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

cc: Listserv

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**ADAMS Accession No. ML23004A171**

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