

NRR-DMPSPeM Resource

From: Purnell, Blake
Sent: Tuesday, December 11, 2018 8:30 AM
To: Loomis, Thomas R:(GenCo-Nuc) (thomas.loomis@exeloncorp.com)
Cc: Barstow, James:(GenCo-Nuc); Wrona, David
Subject: Exelon Generation Company, LLC - Fleet Request to use ASME Code Cases N-878 and N-880 (EPID L-2018-LLR-0077)
Attachments: Exelon N-878 and N-880 RAI.pdf

Mr. Loomis:

By application dated May 30, 2018 (Agencywide Documents Access and Management System Accession No. ML18151A028), as supplemented by letter dated July 26, 2018 (ADAMS Accession No. ML18208A345), Exelon Generation Company, LLC (Exelon, the licensee) submitted a request for a proposed alternative to the requirements of Title 10 of the Code of Federal Regulations (10 CFR) Section 50.55a, "Codes and standards," and the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code for 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; and Three Mile Island Nuclear Station, Unit 1. The proposed alternative would allow the licensee to use ASME Code Case N-878, "Alternative to QA [Quality Assurance] 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."

The NRC staff has reviewed the application and determined that it needs additional information to complete its review. A response to the attached request for additional information is requested to be provided within 30 days from the date of this email. If you have any questions, please contact me at (301) 415-1380.

Sincerely,

Blake Purnell, Project Manager
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission

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, 50-244,
and 50-289

OFFICE	NRR/DORL/LPL3/PM	DMLR/MPHB/BC	NRR/DORL/LPL3/BC
NAME	BPurnell	SRuffin	DWrona

DATE	12/11/18	11/13/18	11/28/18
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Subject: Exelon Generation Company, LLC - Fleet Request to use ASME Code Cases N-878 and N-880 (EPID L-2018-LLR-0077)
Sent Date: 12/11/2018 8:29:55 AM
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From: Purnell, Blake

Created By: Blake.Purnell@nrc.gov

Recipients:

"Barstow, James:(GenCo-Nuc)" <James.Barstow@exeloncorp.com>

Tracking Status: None

"Wrona, David" <David.Wrona@nrc.gov>

Tracking Status: None

"Loomis, Thomas R:(GenCo-Nuc) (thomas.loomis@exeloncorp.com)" <thomas.loomis@exeloncorp.com>

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REQUEST FOR ADDITIONAL INFORMATION

EXELON GENERATION COMPANY, LLC

ALTERNATIVE REQUEST TO USE ASME CODE CASES N-878 AND N-880

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, 50-244, AND 50-289

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The U.S. Nuclear Regulatory Commission has reviewed the application and determined that the information below is needed to complete its review.

RAI-1

Explain how the QA program will ensure that:

- a. the repair/replacement organization has the capability to perform testing and certification of unqualified source material that meets NCA-3855.5, "Utilization of Unqualified Source Materials," subparagraphs (a)(1) through (a)(4), of the ASME BPV Code Section III;
- b. the repair/replacement organization will furnish materials that meet the requirements of paragraphs NCA-3856, "Identification, Marking, and Material Control," and NCA-3862, "Certification of Material," of the ASME BPV Code Section III; and
- c. the procurement of proprietary pipe fittings NPS-2 (DN 50) and smaller are furnished in accordance with the material specification and the applicable requirements of the ASME BPV Code, Section III, and the owner's requirements.

RAI-2

Describe the actions Exelon will take to ensure that:

- a. the weld material procured by the owner or repair/replacement organization is from an approved material organization having a QA program that meets ASME BPV Code, Section III, Subsection NCA, or Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Facilities," to 10 CFR Part 50;
- b. the weld material is not procured as a commercial-grade item and qualified as a basic component under a commercial-grade dedication program;
- c. the weld material meets all the chemical and physical properties of ASME BPV Code, Sections II and III; and
- d. the nondestructive examination inspectors are qualified and certified for the appropriate process and to the level required by ASME BPV Code, Sections III and V.