



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

July 19, 2019

Mr. Bryan C. Hanson
Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Officer (CNO)
Exelon 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 NO. 1; LASALLE COUNTY STATION, UNITS 1 AND 2; LIMERICK GENERATING STATION, UNITS 1 AND 2; NINE MILE POINT NUCLEAR STATION, UNIT 2; AND THREE MILE ISLAND NUCLEAR STATION, UNIT 1 – SUPPLEMENTAL INFORMATION NEEDED TO SUPPORT REQUEST FOR WITHHOLDING INFORMATION REGARDING PROPOSED ALTERNATIVE TO USE ASME CODE CASE N-879 (EPID L-2019-LLR-0037)

Dear Mr. Hanson:

By letter¹ to the U.S. Nuclear Regulatory Commission (NRC) dated April 30, 2019, Exelon Generation Company, LLC (Exelon) submitted a request for a proposed alternative to use American Society of Mechanical Engineers Code Case N-879. The letter included five enclosures, each with a separate affidavit. The affidavits were all dated March 15, 2019, and executed by William H. Lennon, Chief Executive Officer of Lokring Technology, LLC (Lokring). The affidavits requested that information contained in the enclosures be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* Section 2.390. The letter and affidavits have been made publicly available.

The NRC staff has reviewed the affidavits and determined that supplemental information is needed to support the request to withhold information contained in the enclosures from public disclosure. The NRC staff discussed the need for supplemental information with Exelon and Lokring personnel on July 18, 2019. The staff requests that the supplemental information identified in the enclosure to this letter be provided within 30 days from the date of this letter. If the supplemental information is not provided within this timeframe, the staff may deny the request for withholding.

¹ Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML19122A014.

B. Hanson

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If you have any questions regarding this matter, I may be reached at 301-415-1380.

Sincerely,

/RA/

Blake A. Purnell, Project Manager
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,
50-373, 50-374, 50-352,
50-353, 50-220, 50-410,
and 50-289

Enclosure:
Request for Withholding Information

cc: Mr. William H. Lennon
Sole Member and Chief Executive
Lokring Technology LLC
38376 Apollo Parkway
Willoughby, OH 44094

Additional Distribution via Listserv

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 NO. 1; LASALLE COUNTY STATION, UNITS 1 AND 2; LIMERICK GENERATING STATION, UNITS 1 AND 2; NINE MILE POINT NUCLEAR STATION, UNIT 2; AND THREE MILE ISLAND NUCLEAR STATION, UNIT 1 – SUPPLEMENTAL INFORMATION NEEDED TO SUPPORT REQUEST FOR WITHHOLDING INFORMATION REGARDING PROPOSED ALTERNATIVE TO USE ASME CODE CASE N-879 (EPID L-2019-LLR-0037) DATED JULY 19, 2019

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ADAMS Accession No.: ML19179A061

OFFICE	NRR/DORL/LPL3/PM	NRR/DORL/LAiT	NRR/DORL/LPL3/LA
NAME	BPurnell	KEntz	SRohrer
DATE	7/11/19	7/8/19	7/10/19
OFFICE	NRR/DORL/LPL3/BC(A)	NRR/DORL/LPL3/PM	
NAME	LRegner	BPurnell	
DATE	7/11/19	7/19/19	

OFFICIAL RECORD COPY

SUPPLEMENTAL INFORMATION NEEDED
REQUEST FOR WITHHOLDING INFORMATION
REGARDING PROPOSED ALTERNATIVE TO USE ASME CODE CASE N-879
EXELON GENERATION COMPANY, LLC

DOCKET NOS. STN 50-456, STN 50-457, STN 50-454, STN 50-455, 50-317, 50-318,
50-461, 50-373, 50-374, 50-352, 50-353, 50-220, 50-410, AND 50-289

By letter¹ to the U.S. Nuclear Regulatory Commission (NRC) dated April 30, 2019, Exelon Generation Company, LLC (Exelon) submitted a request for a proposed alternative to use American Society of Mechanical Engineers (ASME) Code Case N-879. The letter included five enclosures, each with a separate affidavit. The affidavits were all dated March 15, 2019, and executed by William H. Lennon, Chief Executive Officer of Lokring Technology, LLC (Lokring). The affidavits requested that information contained in the enclosures be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Section 2.390.

The NRC staff has reviewed the affidavits and enclosures and has determined that supplemental information is needed to support the request for withholding from public disclosure. The affidavits imply that each enclosure should be withheld in their entirety since the enclosures do not contain portion marking to indicate the specific information to be withheld.

However, the NRC staff has identified significant discrepancies between the claims in the affidavit and the information in the enclosures. These discrepancies include, but are not limited to, the following:

1. The enclosures included information (e.g., test methods and results, drawings) provided in the public portion of the license amendment request and during a public meeting on January 23, 2019 (ADAMS Accession No. ML19036A883).
2. The enclosures included ASME Code information which is not owned by Lokring and is publicly available.
3. The Lokring Website provides information which appears to be similar to the type of information in the enclosures.
4. The enclosures include forms and reports provided to Lokring by other vendors that appear to be standard forms not owned by Lokring. Information in these forms include company names and addresses, table headings, job numbers, part numbers, and standard wording that would not typically be considered proprietary.

¹ Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML19122A014.

Requested Supplemental Information

1. Provide public and non-public versions of the enclosures. The non-public versions of the enclosures must be portion-marked to identify the specific information requested to be withheld along with the bases for withholding.
2. In accordance with 10 CFR 2.390, provide a revised affidavit to support the request for withholding the portion-marked information in the revised non-public enclosures.
3. Identify any information requested to be withheld that is publicly available. This should include the identification of requirements in codes, standards, or regulations that are part of the current licensing bases for the facilities.