

**From:** Purnell, Blake  
**Sent:** Tuesday, February 2, 2021 9:41 AM  
**To:** Loomis, Thomas R:(GenCo-Nuc) (thomas.loomis@exeloncorp.com)  
**Cc:** Salgado, Nancy; Gudger, David T:(GenCo-Nuc)  
**Subject:** Exelon Generation Company, LLC - Fleet Alternative Request to Expand the Use ASME Codes Cases N-878 and N-880

Mr. Loomis:

By application dated January 4, 2021 (ADAMS Accession No. ML21004A066), Exelon Generation Company, LLC (the licensee) submitted a request in accordance with paragraph 50.55a(z)(1) of Title 10 of the *Code of Federal Regulations* (10 CFR) for a proposed alternative to certain requirements of 10 CFR 50.55a, "Codes and standards," at 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 Generation 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. For each facility, the proposed alternative would allow the licensee to expand the use the American Society of Mechanical Engineers Code Case N-878, "Alternative to QA [Quality Assurance] Program Requirements of IWA-4142, Section XI, Division 1," and Code Case N-880, "Alternative to Procurement Requirements of IWA-4143 for Small Nonstandard Welded Fittings, Section XI, Division ," to carbon steel piping. Currently, the licensee is only authorized to use these code cases for stainless-steel piping systems (ADAMS Accession No. ML19192A244).

The purpose of this email is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this proposed alternative. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed your application and concluded that it provides technical information in sufficient detail to enable the staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed alternative in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review, as compared to the detailed technical review, there may be instances in which issues that impact the staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. You will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, the NRC staff estimates that review of this request will take approximately 275 hours to complete. The staff expects to complete its review by February 2, 2022. These estimates are based on the staff's initial review of the application and they could change due to several factors, including requests for additional information. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes to the forecasted hours, I will inform you of the reason for the change and provide the new estimates.

Sincerely,

Blake Purnell, Project Manager  
Plant Licensing Branch III  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
ph: 301-415-1380

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, and 50-244

EPIDs: L-2021-LLR-0000, -0002, and -0003

**Hearing Identifier:** NRR\_DRMA  
**Email Number:** 996

**Mail Envelope Properties** (BLAPR09MB64810A63FA6D9749579ECC10E6B59)

**Subject:** Exelon Generation Company, LLC - Fleet Alternative Request to Expand the Use  
ASME Codes Cases N-878 and N-880  
**Sent Date:** 2/2/2021 9:41:27 AM  
**Received Date:** 2/2/2021 9:41:27 AM  
**From:** Purnell, Blake

**Created By:** Blake.Purnell@nrc.gov

**Recipients:**

"Salgado, Nancy" <Nancy.Salgado@nrc.gov>

Tracking Status: None

"Gudger, David T:(GenCo-Nuc)" <David.Gudger@exeloncorp.com>

Tracking Status: None

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

Tracking Status: None

**Post Office:** BLAPR09MB6481.namprd09.prod.outlook.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	3862	2/2/2021 9:41:27 AM

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**Priority:** Normal

**Return Notification:** No

**Reply Requested:** No

**Sensitivity:** Normal

**Expiration Date:**