



Joseph A. Dullinger
Plant Manager

Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, MD 20657

410-495-5205 Office
717-309-2403 Mobile

www.exeloncorp.com
joseph.dullinger@exeloncorp.com

July 23, 2021

Steven F. Noonan
Chief Boiler Inspector
Maryland Department of Labor
1100 N Eutaw St, Room 601
Baltimore MD 21201

Subject: Variance Request

The purpose of this letter is to request a one-time variance from the Code of Maryland Regulations (COMAR) 09.12.01.14 for three pressure vessels at the Calvert Cliffs Nuclear Power Plant. It was identified that due to an administrative oversight, multiple pressure vessels onsite did not receive their required vessel inspections in March 2021. Upon that notification, Calvert Cliffs promptly inspected all the overdue pressure vessels except for the three on which we are requesting a one-time variance. The reason Calvert Cliffs is currently unable to inspect these three pressure vessels is due to their location in containment which is where the nuclear reactor is also situated. When the reactor is operating, normal access to containment is limited due to high radiation levels and a high temperature environment.

Due to their location, we are requesting this one-time variance to continue to operate these pressure vessels until our next scheduled shutdown of the Unit 2 nuclear reactor in March 2023 at which time they will undergo the required inspection. During this extended period, the Operation crew does have remote capability to detect leakage from these pressure vessels; therefore, in the unlikely case that significant degradation would occur, it would be identified, and appropriate corrective actions would be taken. It should be further noted, since access to containment when the reactor is operating is strictly controlled and allowed only under specific emergent conditions, there is virtually no risk to station personnel from continued operation of these pressure vessels.

Calvert Cliffs has entered the occurrence of missed required pressure vessel inspections into our corrective action program and have assigned actions to determine the reason this occurred and to take appropriate steps to ensure this does not happen again. The initial learnings from the missed inspections have been shared with all applicable site personnel. Additionally, work orders have been established and scheduled to perform the required inspections on these three pressure vessels during our 2023 refueling outage.

As required in COMMAR 09.12.01.31 the following information is provided below.

Variance from Regulation: COMAR 09.12.01.14
Owner: Exelon Generation Company, LLC
Facility: Calvert Cliffs Nuclear Power Plant, Unit 2

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Address: 1650 Calvert Cliffs Parkway
Lusby, MD 20657

Affected Equipment:

MD056482NV - Reactor Coolant Quench Tank
MD056483NV - Reactor Coolant Drain Tank
MD056484NV - Reactor Coolant Waste Drain Tank Heat Exchanger

Should you have any questions or require additional information, please contact Mr. Larry D. Smith at (410) 495-5219.

Respectfully,



Joseph A. Dullinger
Plant Manager

JAD/KLG/lmd

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bcc: **(Without Attachments)**

T. P. Haaf
J. A. Dullinger
D. J. Hild
H. M. Crockett
D. Baker
L. D. Smith
H. T. Simpson
T. A. Cervini

OA 21-003