

10 CFR 50.55a

RS-08-154

December 3, 2008

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Quad Cities Nuclear Power Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket No. 50-254 and 50-265

Subject: Request to Partially Implement Subsequent Edition of ASME OM Code, Section
ISTC-5222, "Condition-Monitoring Program" and Mandatory Appendix II, "Check
Valve Condition Monitoring Program"

Reference: 1. NRC Regulatory Issue Summary (RIS) 2004-12, "Clarification on Use of
Later Editions and Addenda to the ASME OM Code and Section XI,"
dated July 28, 2004

2. Federal Register, 73 FR 52729, dated September 10, 2008

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (f)(4)(iv) and the guidance provided in Reference 1, Exelon Generation Company, LLC (EGC) requests NRC approval to use portions of a later edition and addenda of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) for the Quad Cities Nuclear Power Station (QCNPS) Inservice Testing (IST) Program.

Specifically, EGC requests approval to implement ISTC-5222, "Condition-Monitoring Program" and Mandatory Appendix II, "Check Valve Condition Monitoring Program," from the 2004 Edition of the ASME OM Code as part of the QCNPS IST Program. The 2004 edition of the ASME OM Code was incorporated by reference into 10 CFR 50.55a(b)(3) by Reference 2, with no new modifications or limitations.

The use of the later edition and addenda of the ASME OM Code is requested for the remainder of the fourth 10-year Inservice Testing (IST) interval, which began February 19, 2004 and is scheduled to end on February 18, 2014.

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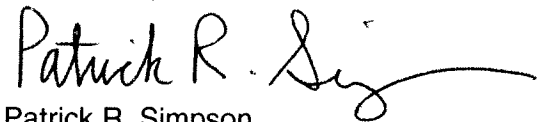
The NRC has recently approved a similar request to adopt Section ISTC-5222 from a later edition of the ASME OM Code. This approval is documented in ADAMS Accession Number ML060590178.

The request is described in the attachment to this letter. EGC requests approval of this request by December 4, 2009.

There are no regulatory commitments in this letter.

If you have any questions concerning this letter, please contact Mr. John L. Schrage at (630) 657-2821.

Respectfully,

A handwritten signature in black ink, appearing to read "Patrick R. Simpson", with a long, sweeping horizontal line extending to the right.

Patrick R. Simpson
Manager - Licensing

Attachment: Request to Partially Implement Subsequent Edition of ASME OM Code, ISTC-5222 and Mandatory Appendix II

Attachment
Request to Implement Subsequent Edition of ASME OM Code
ISTC-5222 and Mandatory Appendix II

In accordance with 10 CFR 50.55a(f)(4)(iv), Exelon Generation Company, LLC (EGC) requests NRC approval to use portions of a later edition and addenda of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) for the Quad Cities Nuclear Power Station (QCNPS) Inservice Testing (IST) Program.

1. ASME Code Component(s) Affected

All ASME Class 1, 2, and 3 check valves that are included in the QCNPS IST Program.

2. Applicable Code Edition and Addenda

ASME OM Code 1998 edition through 2000 addenda.

3. Proposed Subsequent Code Edition and Addenda (or Portion)

ASME OM Code 2004 edition, Section ISTC-5222, "Condition-Monitoring Program," and Mandatory Appendix II, "Check Valve Condition Monitoring Program." The 2004 edition of the ASME OM Code was incorporated by reference into 10 CFR 50.55a(b)(3) by 73 FR 52729.

EGC will apply these portions of the subsequent edition of the ASME OM Code to all ASME Class 1, 2, and 3 check valves that are included in the QCNPS IST Program.

4. Related Requirements

10 CFR 50.55a(f)(4)(iv) states: "Inservice tests of pumps and valves may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (b) of this section, subject to the limitations and modifications listed in paragraph (b) of this section, and subject to Commission approval. Portions of editions or addenda may be used provided that all related requirements of the respective editions or addenda are met."

As stated in 73 FR 52729, the "...revision to 10 CFR 50.55a(b)(3) incorporates by reference the 2004 Edition of the ASME OM Code subject to no new modifications or limitations." The existing limitations and modifications that are applicable to Mandatory Appendix II are described in 10 CFR 50.55a(b)(3)(iv), "Appendix II."

10 CFR 50.55a(b)(3)(iv)(D) requires that the applicable provisions of subsection ISTC must be implemented if the Mandatory Appendix II condition monitoring program is discontinued. For check valves that are removed from the QCNPS conditioning monitoring program, or in the case of discontinuation of the QCNPS condition monitoring program, EGC will implement the applicable provisions of Subsection ISTC of the ASME OM Code, 2004 edition.

Attachment
Request to Implement Subsequent Edition of ASME OM Code
ISTC-5222 and Mandatory Appendix II

5. Duration of Proposed Request

ASME OM Code 2004 Edition, Mandatory Appendix II will be used for the remainder of the fourth ten-year interval, which began February 19, 2004 and is scheduled to end on February 18, 2014.