

10 CFR 50.55a

RS-09-017

February 2, 2009

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:** Clarifying Information Concerning Request to Implement Subsequent Edition of ASME OM Code, Subsection ISTC, "Inservice Testing of Valves in Light-Water Reactor Nuclear Power Plants"

- Reference:**
1. Letter from P. R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "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'," dated December 3, 2008
  2. 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
  3. Federal Register, 73 FR 52729, dated September 10, 2008

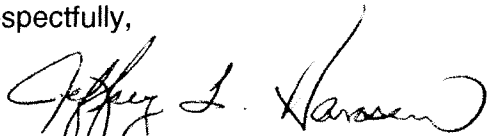
In Reference 1, Exelon Generation Company, LLC (EGC) requested NRC approval to implement ISTC-5222, "Condition-Monitoring Program" and Mandatory Appendix II, "Check Valve Condition Monitoring Program," from the 2004 Edition of the of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) for the Quad Cities Nuclear Power Station (QCNPS) Inservice Testing (IST) Program. The purpose of this letter is to provide a clarification to the Reference 1 request. This clarification is provided in the attachment to this letter.

February 2, 2009  
U. S. Nuclear Regulatory Commission  
Page 2

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 "Jeffrey L. Hansen". The signature is written in a cursive style with a large, sweeping initial "J".

Jeffrey L. Hansen  
Manager - Licensing

Attachment: Request in Accordance with 10 CFR 50.55a(f)(4)(iv) for Check Valve Testing

**Attachment**  
**Request in Accordance with 10 CFR 50.55a(f)(4)(iv) for Check Valve Testing**

**1. ASME Code Component(s) Affected**

All check valves that are included in the Quad Cities Nuclear Power Station (QCNPS) Inservice Testing (IST) program.

**2. Applicable Code Edition and Addenda**

American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code), 1998 edition through 2000 addenda.

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

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (f)(4)(iv), EGC requests NRC approval to implement Subsection ISTC, "Inservice Testing of Valves in Light-Water Reactor Nuclear Power Plants," from the 2004 Edition of the ASME OM Code for the conduct of check valve testing at QCNPS. The 2004 edition of the ASME OM Code was incorporated by reference into 10 CFR 50.55a(b)(3) by 73 FR 52729.

**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."

**5. Duration of Proposed Request**

ASME OM Code, 2004 Edition, Subsection ISTC will be used for check valve testing during the remainder of the fourth ten-year interval, which began February 19, 2004 and is scheduled to end on February 18, 2014.