



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

June 3, 2010

Mr. Charles G. Pardee
Senior Vice President, Exelon Generation Company, LLC
President and Chief Nuclear Officer (CNO), Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

**SUBJECT: QUAD CITIES NUCLEAR POWER STATION EVALUATION OF CHANGES,
TESTS, OR EXPERIMENTS AND PERMANENT PLANT MODIFICATIONS
BASELINE INSPECTION REPORT 05000254/2010007(DRS);
05000265/2010007(DRS)**

Dear Mr. Pardee:

On May 14, 2010, the U.S. Nuclear Regulatory Commission (NRC) completed an Evaluations of Changes, Tests, or Experiments and Permanent Plant Modifications inspection at your Quad Cities Nuclear Power Station. The enclosed inspection report documents the inspection results, which were discussed on May 14, 2010, with Mr. W. Beck and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the results of this inspection, no findings of significance were identified.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System (PARS) component of NRC's Agencywide

C. Pardee

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Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Robert C. Daley, Chief
Engineering Branch 3
Division of Reactor Safety

Docket No.50-254; 50-265
License No.DPR-29; DPR-30

Enclosure: Inspection Report 05000254/2010007; 05000265/2010007
w/Attachment: Supplemental Information

cc w/encl: Distribution via ListServe

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-254; 50-265

License No: DPR-29; DPR-30

Report No: 05000254/2010007 and 05000265/2010007(DRS)

Licensee: Exelon Nuclear

Facility: Quad Cities Nuclear Power Station, Units 1 and 2

Location: Cordova, IL

Dates: April 26 through May 14, 2010

Inspectors: Z. Falevits, Senior Reactor Inspector (Lead)
J. Neurauter, Senior Reactor Inspector
R. Winter, Reactor Inspector

Approved by: Robert C. Daley, Chief
Engineering Branch 3
Division of Reactor Safety

Enclosure

SUMMARY OF FINDINGS

IR 05000254/2010007, 05000265/2010007; 04/26/2010 – 05/14/2010; Quad Cities Nuclear Power Station, Units 1 and 2; Evaluations of Changes, Tests, or Experiments and Permanent Plant Modifications.

This report covers a two-week announced baseline inspection on evaluations of changes, tests, or experiments and permanent plant modifications. The inspection was conducted by Region III based engineering inspectors. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter (IMC) 0609, "Significance Determination Process" (SDP). Findings for which the SDP does not apply may be Green or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, dated December 2006.

A. NRC-Identified and Self-Revealed Findings

No violations of significance were identified.

B. Licensee-Identified Violations

No violations of significance were identified.

REPORT DETAILS

1. REACTOR SAFETY

Cornerstone: Initiating Events, Mitigating Systems, and Barrier Integrity

1R17 Evaluations of Changes, Tests, or Experiments and Permanent Plant Modifications (71111.17)

.1 Evaluation of Changes, Tests, or Experiments

a. Inspection Scope

From April 26, 2010 through May 14, 2010, the inspectors reviewed six safety evaluations performed pursuant to 10 CFR 50.59 to determine if the evaluations were adequate and that prior NRC approval was obtained as appropriate. The inspectors also reviewed 18 screenings where licensee personnel had determined that a 10 CFR 50.59 evaluation was not necessary. The inspectors reviewed these documents to determine if:

- the changes, tests, or experiments performed were evaluated in accordance with 10 CFR 50.59 and that sufficient documentation existed to confirm that a license amendment was not required;
- the safety issue requiring the change, tests, or experiment was resolved;
- the licensee conclusions for evaluations of changes, tests, or experiments were correct and consistent with 10 CFR 50.59; and
- the design and licensing basis documentation was updated to reflect the change.

The inspectors used, in part, Nuclear Energy Institute (NEI) 96-07, "Guidelines for 10 CFR 50.59 Implementation," Revision 1, to determine acceptability of the completed evaluations and screenings. The NEI document was endorsed by the NRC in Regulatory Guide 1.187, "Guidance for Implementation of 10 CFR 50.59, Changes, Tests, and Experiments," dated November 2000. The inspectors also consulted Part 9900 of the NRC Inspection Manual, "10 CFR Guidance for 10 CFR 50.59, Changes, Tests, and Experiments."

This inspection constituted six samples of evaluations and 18 samples of changes as defined in IP 71111.17-04.

b. Findings

No findings of significance were identified.

.2 Permanent Plant Modifications

a. Inspection Scope

From April 26, 2010 through May 14, 2010, the inspectors reviewed 11 permanent plant modifications, including one equivalency evaluation that had been installed in the plant during the last three years. This review included in-plant walkdown inspections of portions of the Unit 2 250 volts direct current (VDC) battery foam spacer replacement modification; loss of excitation relay in emergency diesel generator (EDG) room panel 2251-10 modification; Diesel fire pumps at screen house modification; Turbine Building emergency lighting units; 480V switchgear RMS-9 trip unit modification; Turbine Building Adjustable Speed Drive (ASD) and Anticipated Transient Without Scram (ATWS) modification; and the ATWS electrical controls cabinet fuses and wiring as built configuration. The modifications were selected based upon risk-significance, safety significance, and complexity. The inspectors reviewed the modifications selected to determine if:

- the supporting design and licensing basis documentation was updated;
- the changes were in accordance with the specified design requirements;
- the procedures and training plans affected by the modification have been adequately updated;
- the test documentation as required by the applicable test programs has been updated; and
- post-modification testing adequately verified system operability and/or functionality.

The inspectors also used applicable industry standards to evaluate acceptability of the modifications. The list of modifications and other documents reviewed by the inspectors is included as an attachment to this report.

This inspection constituted eleven permanent plant modification samples as defined in IP 711111.17-04.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES (OA)

4OA2 Identification and Resolution of Problems

.1 Routine Review of Condition Reports

a. Inspection Scope

From April 26, 2010 through May 14, 2010, the inspectors reviewed various corrective action process documents that identified or were related to 10 CFR 50.59 evaluations and permanent plant modifications. The inspectors reviewed these documents to evaluate the effectiveness of corrective actions related to permanent plant modifications and evaluations for changes, tests, or experiments issues. In addition, corrective action documents written on issues identified during the inspection were reviewed to verify adequate problem identification and incorporation of the problems into the corrective action system. The specific corrective action documents that were sampled and reviewed by the inspectors are listed in the Attachment to this report.

b. Findings

No findings of significance were identified.

4OA6 Meetings

.1 Exit Meeting Summary

On May 14, 2010, the inspectors presented the inspection results to Mr. W. Beck and other members of the licensee staff. The licensee personnel acknowledged the inspection results presented and did not identify any proprietary content. The inspectors confirmed that all proprietary material reviewed during the inspection was returned to the licensee staff.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

W. Beck, Regulatory Assurance Manager
K. Donovan, Maintenance Deputy Director
D. Collins, RP Manager
C. Alguire, SMDE/Acting SED
T. Peterson, Regulatory Assurance
R. Buttke, Design Engineering
B. Wehrman, Design Engineering
W. Schmidt, NOS
D. Collins, Design Engineering
M. Wagner, Regulatory Assurance
J. Bailey System Engineering
V. Ezugha, System Engineering
J. Taft, Design Engineering

Nuclear Regulatory Commission

J. McGhee, Senior Resident Inspector
E. Coffman, Reactor Engineer

LIST OF ITEMS OPENED, CLOSED AND DISCUSSED

Opened, Closed, and Discussed

None

LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety, but rather, that selected sections or portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

10 CFR 50.59 EVALUATIONS

| <u>Number</u> | <u>Description or Title</u> | <u>Date or Revision</u> |
|---------------|--|-------------------------|
| QC-E-2007-002 | Lift Lead to Restore CRD Indication and Remote Nuisance Overtravel Alarm Indication | 07/27/07 |
| QC-E-2008-001 | Replace Recirculation MG Sets with ASD Units (Unit 1 and 2) | 1 |
| QC-E-2008-002 | ATWS Requirements for Recirculation ASD Installation (Unit 1 and 2) | 0 |
| QC-E-2009-001 | Replace Low Pressure Turbine Rotors and Inner Casings (Unit 2) | 1 |
| QC-E-2010-001 | U2 250Vdc Battery Foam Spacer Replacement via a Procedurally Controlled TCCP (EC 377684) | 02/12/10 |
| QC-E-2010-002 | Operations with Potential for Draining Reactor Vessel (OPDRVs) | 0 |

10 CFR 50.59 SCREENINGS

| <u>Number</u> | <u>Description or Title</u> | <u>Date or Revision</u> |
|----------------|---|-------------------------|
| QC-S-2007-0142 | Partial Scram Actuation | 10/19/07 |
| QC-S-2007-0094 | RAT 12(22) Load Tap Changer Operation | 06/22/07 |
| QC-S-2008-0123 | Replace RHR Injection Valve 2-1001-28B Open Interlock Timer | 10/01/08 |
| QC-S-2007-0167 | Implementation of Circuit Breaker Settings as Described in Calculations | 12/07/07 |
| QC-S-2007-0092 | DCR Calculation/EC 366230 Battery Interconnections | 06/26/07 |
| QC-S-2010-0001 | TCCP/Temp Interim Change TIC-2498 | 02/12/10 |
| QC-S-2008-0139 | Revision 001 to Calculation ODC-8300-E-1587 for Battery Intercell Resistance Limits | 11/11/08 |
| QC-S-2007-0141 | Install Manual "Droop" Switch on Unit 0, 1, 2 Emergency Diesel Generators | 1 |
| QC-S-2008-0101 | SSMP Surveillance Criteria for Tech Spec and Appendix R Compliance | 0 |
| QC-S-2009-0012 | Revise UFSAR Section 5.4.13.3 to Remove Requirement to Replace Unit 1 "E" ERV Every Refuel Outage | 0 |

10 CFR 50.59 SCREENINGS

| <u>Number</u> | <u>Description or Title</u> | <u>Date or Revision</u> |
|----------------|--|-------------------------|
| QC-S-2009-0075 | Complete Loss Of Control Room HVAC | 0 |
| QC-S-2009-0077 | Appendix R Impact on the 250 Vdc Systems | 0 |
| QC-S-2008-0020 | Generator Rotor Heavy Load Lift in Reactor Building | 0 |
| QC-S-2008-0137 | LPCI Minimum Flow Bypass Setpoint Change | 0 |
| QC-S-2009-0072 | Drywell and Torus Differential Pressure Control System Startup | 0 |
| QC-S-2009-0074 | Operating Basis Earthquake Exceedance Shutdown Requirement | 0 |
| QC-S-2009-0083 | Torus Water High Temperature | 0 |
| QC-S-2009-0122 | Fuel Handling in or Between Fuel Storage Pools | 0 |

CORRECTIVE ACTION PROGRAM DOCUMENTS GENERATED

| <u>Number</u> | <u>Description or Title</u> | <u>Date or Revision</u> |
|---------------|---|-------------------------|
| CR-01069343 | Mods/50.59 -- Lesson Learned on Tool Pouch Maintenance | 05/14/10 |
| CR-01068772 | Mods/50.59 -- Lesson Learned for Formal Communication | 05/13/10 |
| CR-01067888 | Mods/50.59 -- Error Discovered in Calculation QDC-1000-I-0164 | 05/11/10 |
| CR-01068071 | NRC ID -- FME Identified Between Cells | 05/11/10 |
| CR-01068391 | Mods/50.59 -- Incorrect UFSAR Section Listed in Calculation | 05/12/10 |
| CR-01068540 | Mods/50.59 -- Emergency Light Pack Orientation | 05/12/10 |
| CR-01066138 | Mods/50.59 -- Unclear Response in 50.59 Evaluation | 05/06/10 |
| CR-01066095 | Mods/50.59 -- Degraded Overcurrent Indicator | 05/04/10 |
| CR-01063743 | CCP Mods/50.59 -- Improve Depiction of Relay on Drawing | 04/30/10 |
| CR-01063242 | Mods/50.59 -- Emergency Light Pack Light Mispositioned | 04/29/10 |
| CR-01063204 | CCP Mods/50.59 -- Dwg 4E-6579A Error for ATWS 2201-70B Wiring | 04/29/10 |
| CR-01062744 | Mods/50.59 -- Fuse Size not Shown on Schematic | 04/28/10 |

CORRECTIVE ACTION PROGRAM DOCUMENTS REVIEWED

| <u>Number</u> | <u>Description or Title</u> | <u>Date or Revision</u> |
|---------------|--|-------------------------|
| CR-00591375 | Additional MCCs at Risk of Individual Load | 02/14/07 |

CORRECTIVE ACTION PROGRAM DOCUMENTS REVIEWED

| <u>Number</u> | <u>Description or Title</u> | <u>Date or Revision</u> |
|---------------|---|-------------------------|
| | Fault Propagation | |
| CR-00668845 | 2007 Mods/50.59 Inspection--MOV Testing Margin | 09/07/07 |
| CR-00824849 | 5 Minute Time Delay Relay Failed (10A-K48B) | 10/01/08 |
| CR-00822508 | Seismic Issue with 250VDC & U2 Alt. 125VDC Battery | 09/25/08 |
| CR-00969849 | U1 EDG CWP Tripped While Running on Alternate Feed | 09/24/09 |
| CR-00945275 | FPI - SSMP Breaker Coordination Issue | 07/30/09 |
| CR-00914834 | Withdrawal of LAR for QC Battery Surveillance Requirements | 06/25/09 |
| CR-00478396 | PSU Q2R18 Erratic Indications when Paralleling U-2 EDG | 06/13/06 |
| CR-00559376 | Sequential Fire Pump Start – Code Compliance | 11/17/06 |
| CR-00666761 | 2007 MODS/50.59 INSP'N 50.59 not Identified as Comp Measure | 08/31/07 |
| CR-00757173 | TCCP 361778 Removal Steps not Signed Off | 03/31/08 |
| CR-00795531 | SSMP Discharge Calculation Error – Historical Impact | 07/11/08 |
| CR-00885896 | NOS ID: New 50.59 Screening not Performed for IEE | 02/26/09 |
| CR-00899410 | FME – ½ Diesel Fire Pump Oil Dip Stick Tip is Broken Off | 03/29/09 |
| CR-00931821 | Triennial Fire Protection FASA – Appendix R – 250 VDC | 06/16/09 |
| CR-00936755 | OLL Fire Hose Reel Moved for ASD MOD | 06/29/09 |
| CR-00983450 | ASD Panel Internal Wiring Differences with MOD Drawings | 10/23/09 |
| CR 00830304 | CDBI – LPCI Min Flow Bypass Setpoint “WC” Values Incorrect | 10/13/08 |
| CR 00894959 | Seismic OBE Shutdown Needs Incorporation into Procedures | 03/19/09 |
| CR 01057507 | Operation with Potential to Drain Vessel | 04/16/10 |

DRAWINGS

| <u>Number</u> | <u>Description or Title</u> | <u>Date or Revision</u> |
|---------------|--|-------------------------|
| 4E-1303 | Key Diagram – 4160V Switchgear 11, 12, 13 and 14 | U |
| 4E-1421 | Relay and Metering Diagram Recirculating Pump ASD 1A | T |
| 4E-6577C | Schematic Diagram – ATWS Recirc Pump Trip System ECCS Init-FW, RCIC, HPCI and Turb Trips Div I and Div II – Part 3 | M |

DRAWINGS

| <u>Number</u> | <u>Description or Title</u> | <u>Date or Revision</u> |
|---------------|--|-------------------------|
| 4E-6577D | Schematic Diagram – ATWS Recirc Pump Trip System ECCS Init-FW, RCIC, HPCI and Turb Trips Div I and Div II – Part 4 | H |
| 4E-6577F | Schematic Diagram – ATWS Recirc Pump Trip System ECCS Init-FW, RCIC, HPCI and Turb Trips Div I and Div II – Part 6 | R and S |
| 4E-6578A | Panel 2201-70A Wiring Diagram – ATWS Recirc Pump Trip System ECCS Init-FW, RCIC, HPCI and Turb Trips Div I – Part 1 | Y |
| 4E-6579A | Panel 2201-70B Wiring Diagram – ATWS Recirc Pump Trip System ECCS Init-FW, RCIC, HPCI and Turb Trips Div II – Part 1 | AE |
| 4E-2438F | Schematic Diagram – RHR System Relay Logic Div II -- Sheet 6 | R |
| 4E-2765B | Wiring Diagram – Panel 902-47 | K |
| 4E-1908Q | Cable Tabulation Cables 19100 to 19149 | A |
| 4E-1412 | Schematic Diagrams Recirculation Pump ASD 1A Input Breaker Control – Sheet 1 | D |
| 4E-1422 | Schematic Diagrams Recirculation Pump ASD 1A Input Breaker Control – Sheet 1 | D |
| 4E-1336 | Relay Meter and Excitation Diagram, Standby Diesel Generator 1 | AB |
| 4E-1346 | Schematic Control Diagram, 4160V Bus 14-1 Standby Diesel 1 Feed and 24-1 Tie Breaker | AY |
| 4E-1350B | Schematic Diagram, Diesel Generator No. 1 Auxiliaries and Start Relay | AT |

EQUIVALENCY EVALUATION

| <u>Number</u> | <u>Description or Title</u> | <u>Date or Revision</u> |
|---------------|---|-------------------------|
| 48676 | Loss of Excitation Relay 0(1)(2)-6601-5 | 09/24/07 |

MISCELLANEOUS

| <u>Number</u> | <u>Description or Title</u> | <u>Date or Revision</u> |
|------------------|---|-------------------------|
| IEEE Std 279 | Criteria for Protection Systems for Nuclear Power Generating Stations | 06/03/1971 |
| IEEE Std 308 | Class IE Electrical Systems for Nuclear Power Generating Stations | 05/06/1971 |
| UFSAR-07-R10-052 | Change to UFSAR Section 3.7.4, Seismic Instrumentation | 06/12/09 |
| SL-9356 | Plan for Unit 2 Generator Rotor Removal Path | 0 |

MODIFICATIONS

| <u>Number</u> | <u>Description or Title</u> | <u>Date or Revision</u> |
|--------------------|---|-------------------------|
| EC-366310 | Rx Recirculation MG Set Replacement with ASD Units | 007 |
| EC-0000377092 | Change RMS-9 Setting at SWGR 19 Cub 5D to Account for Cooling Water Pump Motor Current | 11/11/09 |
| EC-0000372390 | Replace RHR Injection Valve 2-1001-28B Open Interlock Timer Relay 2-1000-10A-K48B | 10/02/08 |
| EC-0000376390 | Replace Circuit Breaker 1-8301-1B1-C2-07 (Bus 1B-1, Cub C2, Ckt 7) With a 100 Amp HFD Breaker | 08/27/09 |
| EC-0000371744 | Replace Fuses and Links in U2 EDG Control Panel 2-2252-113 | 12/12/08 |
| EC-0000344616 | Remove Power and Control circuits from the Reactor Recirculation Cross-Tie Motor operated Gate Valves | 3 |
| EC-0000360507 | U2 EDG Voltage Regulator (Place the EDG in Droop Mode prior to Synchronizing to the Grid) | 1 |
| EC-0000367027 | Fire System Water Header Pressure Low Setpoint Change to Prevent Simultaneous Fire Diesel Starts | 0 |
| EC 372596 (Unit 1) | LPCI Minimum Flow Bypass Setpoint | 0 |
| EC 372597 (Unit 2) | Change | |
| EC 368945 | Revise Various Documents Supporting Generator Rotor Replacement | 0 |

PROCEDURES

| <u>Number</u> | <u>Description or Title</u> | <u>Date or Revision</u> |
|----------------|---|-------------------------|
| LS-AA-104-1000 | 50.59 Resource Manual | 5 |
| MA-AA-723-350 | Emergency Lighting Battery Pack Quarterly Inspection | 10 |
| QCOP 6600-01 | Diesel Generator 1(2) Preparation for Standby Operation | 38 |
| QCOP 6600-03 | Diesel Generator 1(2) Shut Down | 23 |
| QCOS 2901-01 | Safe Shutdown Makeup Pump Flow Rate Test | 32 |
| QCOS 6900-19 | Station Safety Related Battery Monthly Surveillance | 7 |
| QOA 5750-15 | Complete Loss of Control Room HVAC | 10 |
| OP-AB-117-101 | Operations with Potential to Drain Reactor Vessel (OPDRV) | 0 |
| OP-QC-117-101 | Operations with Potential to Drain Reactor Vessel (OPDRV) | 0A |

PROCEDURES

| <u>Number</u> | <u>Description or Title</u> | <u>Date or Revision</u> |
|----------------------|---|--------------------------------|
| QCAN 901(2)-4 G-17 | Torus Water High Temperature | 12 |
| QCFHP 0300-06 | Fuel Handling in Or Between Fuel Storage Pools | 12 |
| QCIS 1000-15 | LPCI Pump Discharge Flow Analog Trip System Calibration and Functional Test | 12 |
| QCIS 1000-16 | LPCI Pump Discharge Flow Transmitter Loop Calibration | 10 |
| QCOA 0010-09 | Earthquake | 11 |
| QCOA 1600-03 | Torus Water High Temperature | 13 |
| QCOP 1600-21 | Drywell and Torus Differential Pressure Control System Startup | 29 |
| QCMM 5800-06 | Movement of Heavy Loads with Turbine Building Overhead Crane | 12 |
| QCMM 5800-09 | Removal and Installation of Unit 2 Generator Rotor | 3 |
| QOA 3300-02 | Loss of Condenser Vacuum | 36 |

Work Orders

| <u>Number</u> | <u>Description or Title</u> | <u>Date or Revision</u> |
|----------------------|---|--------------------------------|
| 01172145 | EM Contingency Troubleshooter for 2B LPCI and RHR Testing | 10/01/08 |
| 01272234 | Change RMS-9 Setting at SWGR 9 Cub 5D Per EC 377092 | 10/19/09 |
| 01310307 01 | Light Pack Inspection Group 6 | 05/03/10 |
| 00360507 03 | U2 EDG Voltage Regulator (Droop Mode prior to Synchronizing to the Grid) | 10/29/09 |

LIST OF ACRONYMS USED

| | |
|-------|---|
| ADAMS | Agencywide Documents Access and Management System |
| ADS | Adjustable Speed Drive |
| AEC | Atomic Energy Commission |
| AR | Action Request |
| ATWS | Anticipated Transient Without Scram |
| CDBI | Component Design Basis Inspection |
| CFR | Code of Federal Regulations |
| CRD | Control Rod Drive |
| DRP | Division of Reactor Projects |
| DRS | Division of Reactor Safety |
| EC | Engineering Change |
| EDG | Emergency Diesel Generator |
| GL | Generic Letter |
| HPCI | High Pressure Coolant Injection |
| IMC | Inspection Manual Chapter |
| MOV | Motor-Operated Valve |
| NRC | U.S. Nuclear Regulatory Commission |
| PARS | Public Available Records System |
| RHR | Residual Heat Removal |
| RHRSW | Residual Heat Removal Service Water |
| SDP | Significance Determination Process |
| SW | Service Water |
| USAR | Updated Safety Analysis Report |
| VAC | Volts Alternating Current |
| VDC | Volts Direct Current |

C. Pardee

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Sincerely,
/RA/

Robert C. Daley, Chief
Engineering Branch 3
Division of Reactor Safety

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