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SVP-10-080

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

Quad Cities Nuclear Power Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

Subject: Revised License Renewal Commitment for Thermal Aging and Neutron Irradiation Embrittlement of Cast Austenitic Stainless Steel (CASS) Reactor Internal Components

- References:**
- (1) Letter from P. R. Simpson (Exelon Generation Company, LLC), to USNRC, "Additional Information for the Review of the License Renewal Applications for Quad Cities Nuclear Power Station, Units 1 and 2 and Dresden Nuclear Power Station, Units 2 and 3," dated October 3, 2003
 - (2) NUREG 1796, "Safety Evaluation Report Related to the License Renewal of the Dresden Nuclear Power Station, Units 2 and 3 and Quad Cities Nuclear Power Station, Units 1 and 2," published October 2004

The purpose of this letter is to inform the NRC that Exelon Generation Company, LLC (EGC) is revising a commitment identified in References (1) and (2) for Quad Cities Nuclear Power Station (QCNPS). In Reference (1), as a part of EGC's license renewal application for QCNPS, and as documented in Reference 2, Appendix A, EGC made the following commitment:

"An aging management program will be implemented for thermal aging and neutron irradiation embrittlement of Cast Austenitic Stainless Steel (CASS) reactor internal components within the scope of license renewal. A component specific evaluation for the loss of fracture toughness will be included. For those components where the loss of fracture toughness may affect the function of the component, an inspection will be performed as part of the ISI Program."

The original commitment included an evaluation that requires the material composition be obtained from Certified Material Test Reports (CMTRs). The CMTRs could not be located for the components in question. The underlying purpose of this commitment is to establish an inspection program for susceptible CASS components where a loss of fracture toughness may affect component function. The inability to determine material composition from CMTRs impacts our ability to evaluate CASS components for a loss of fracture toughness.

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Therefore, EGC will conservatively assume all applicable components are susceptible and establish an inspection program for these components, the same as would be required by the original commitment if an evaluation had concluded there was a loss of fracture toughness potentially affecting component function.

As a result of the above, EGC is revising commitment number 10 as documented in Appendix A to Reference 2. The revised commitment is included as Attachment 1 to this letter. Should you have any questions concerning this letter, please contact Mr. W. J. Beck at (309) 227-2800.

Respectfully,



William R. Gideon
Site Vice President
Quad Cities Nuclear Power Station

Attachment: QCNPS Regulatory Commitment Change Summary Report

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Quad Cities Nuclear Power Station

Attachment 1

SUMMARY OF REGULATORY COMMITMENTS

The following table identifies commitments made in this document. (Any other actions discussed in the document represent intended or planned actions. They are described to the NRC for the NRC's information and are not regulatory commitments.)

COMMITMENT	COMMITTED DATE OR "OUTAGE"	COMMITMENT TYPE	
		ONE-TIME ACTION (Yes/No)	PROGRAMMATIC (Yes/No)
An aging management program will be implemented for thermal aging and neutron irradiation embrittlement of Cast Austenitic Stainless Steel (CASS) reactor internal components within the scope of license renewal. A component specific evaluation for the loss of fracture toughness will be included. If material composition cannot be determined, a loss of fracture toughness may be assumed as an alternative to a specific evaluation. For those components where it is assumed or the evaluation has determined a loss of fracture toughness may affect the function of the component, an inspection will be performed as part of the ISI and Reactor Internals Programs.	12/14/2012	No	Yes