Exelon Generation Company, LLC Quad Cities Nuclear Power Station 22710 206th Avenue North Cordova, IL 61242–9740

www.exeloncorp.com



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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: Clarification of License Renewal Commitment Regarding Bellows Testing

References: 1. Letter from P. R. Simpson (Exelon Generation Company, LLC), to U. S. NRC, "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

- 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"
- B. A. Boger (U. S. NRC) letter to T. J. Kovach (ComEd), "Exemption from the Testing Requirements of Appendix J to 10 CFR Part 50 for Dresden and Quad Cities Nuclear Power Stations," dated February 6, 1992
- Letter from T. Hanley (Exelon Generation Company, LLC) to U. S. NRC, "Revised License Renewal Commitment for the Testing of Drywell to Suppression Chamber Vent Lines Expansion Bellows," dated October 2, 2009

The purpose of this letter is to clarify our commitment related to leak testing primary containment expansion bellows at Quad Cities Nuclear Power Station (QCNPS). In Reference 1, Exelon Generation Company, LLC (EGC), communicated that primary containment expansion bellows are within the scope of License Renewal. As noted in the Reference 2 Safety Evaluation (i.e., Appendix A, Commitments, Item 26): "The pressurized testing methodology will be credited for managing the aging of bellows." EGC is not modifying this commitment; however, the type of test depends on the bellows design. In 1991 it was identified that a 10 CFR 50, Appendix J, Type B test did not reliably quantify higher levels of leakage when applied to the original two-ply bellows design. Accordingly, a unique methodology was submitted and approved by the NRC in Reference 3. Furthermore, the drywell-to-suppression chamber vent line bellows at QCNPS (eight per unit) are not Type B testable and can only be tested using a 10 CFR 50, Appendix J, Type A test.

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These clarifications do not affect the conclusions in Reference 2 regarding susceptibility to stress corrosion cracking (i.e., Section 3.5.2.2.1) and fatigue analyses (i.e., Section 4.6.2.3). The primary containment bellows within the scope of License Renewal will be tested using either the unique pressurized testing methodology approved in Reference 3, or as allowed under Appendix J, Type A or Type B. A similar notification was made in Reference 4.

Should you have any questions concerning this letter, please contact Mr. Wally J. Beck at (309) 227-2800.

Respectfully,

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

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