



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

September 12, 2012

Mr. Michael J. Pacilio
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, UNITS 1 AND 2 - REQUEST FOR ADDITIONAL INFORMATION RELATED TO RELIEF REQUEST RV-01, RV-03, RV-05, AND RV-06 (TAC NOS. ME7983, ME7984, ME7987, ME7988, ME7992, ME7993, ME7994, AND ME7995)

Dear Mr. Pacilio:

By letter to the U.S. Nuclear Regulatory Commission (NRC) dated February 15, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12046A334), Exelon Generation Company, LLC submitted "Relief Requests Associated with Fifth Inservice Testing Interval," for Quad Cities Nuclear Power Station, Units 1 and 2.

The NRC staff is reviewing your submittal and has determined that additional information is required to complete the review. The specific information requested is addressed in the enclosure to this letter. During a request for additional information (RAI) clarification call with Dave Gullott of your staff on August 10, 2012, it was agreed that you would provide a response by September 17, 2012.

The NRC staff considers that timely responses to requests for additional information help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-1055.

Sincerely,

A handwritten signature in black ink, appearing to read "Brenda Mozafari", followed by the word "for" written in a cursive script.

Brenda Mozafari, Senior Project Manager
Plant Licensing Branch III-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-254 and 50-265

Enclosure:
Request for Additional Information
cc w/encl: Listserv

REQUEST FOR ADDITIONAL INFORMATION

QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2

RELIEF REQUEST RV-01, RV-03, RV-05, AND RV-06

DOCKET NOS. 50-254 AND 50-265

TAC NOS. ME7983, ME7984, ME7987, ME7988,

ME7992, ME7993, ME7994, AND ME7995

In reviewing the Exelon Generation Company's (Exelon's) submittal to the U.S. Nuclear Regulatory Commission (NRC), dated February 15, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12046A334), related to submittal of "Relief Requests: Associated with Fifth Inservice Testing Interval," for the Quad Cities Nuclear Power Station, Units 1 and 2 (QCNPS), the NRC staff has determined that the following information is needed in order to complete its review:

RAI RV-01-1:

The alternative identified in Section 5 for relief request (RR) RV-01 is based on, but reads differently than, the code case for inservice test (IST) frequency approved by the American Society of Mechanical Engineers (ASME) Operations and Maintenance (OM) Code Standards Committee. (This code case was approved for use by the ASME OM Standards Committee and the ASME Board of Nuclear Codes and Standards and is currently identified by ASME according to its Record Number 10-1992. This code case will carry a conventional number (OMN-xx) when it is published with the next OM Code edition.)

Describe whether it is Exelon's intent to adopt all of the language of the approved Code Case 10-1992, for the fifth inservice testing interval at QCNPS, as an alternative to the current IST frequency requirements listed in the QCNPS, technical specifications and the guidance provided in NRC NUREG-1482, Revision 1.

RAI RV-03-1:

In the noted reference for RR RV-03, Section 4, "Reason for Request," the second paragraph, third sentence, states that "While the motor-operated Pressure Indicating Valves (PIVs) affected by this relief request are also containment isolation valves (CIVs) and tested in accordance with the Appendix J program, the check valve PIVs are not CIVs and not within the Appendix J scope." The RR does not provide any details (i.e., CIVs, PIVs, or check valve etc.) for the components listed in Section 1 of the RR.

- (a) Please specify whether the listed valves are CIVs, PIVs, or check valves.
- (b) Please provide the current frequency used at QCNPS for (1) functional testing and/or position indicator testing of the PIVs, and (2) leak rate testing of the PIVs.

RAI RV-03-2:

In the "Reason for Request," section of the noted reference, the third paragraph, fifth and sixth sentences state that "The functional testing of the PIV check valves will be monitored through a Condition Monitoring Plan in accordance with ISTC-5222, "Condition-Monitoring Program," and Mandatory Appendix II, "Check Valve Condition Monitoring Program." Performance of the separate 2-year PIV leak rate testing does not contribute any additional assurance of functional capability; it only determines the seat tightness of the closed valves.

The use of a "Check Valve Conditioning Program," allows for testing of a check valve (group of one valve) extension of up to once in a 10-year interval. Please describe if allowing check valve testing once every 10 years, along with the proposed extension of leak rate testing (based on the Nuclear Energy Institute 94-01 "Industry Guideline for Implementing Performance Based Option of 10 CPR Part 50, Appendix J", to once every 54 months in lieu of 18 months) assures functional capability and operational readiness of these valves.

RAI RV-03-3:

In the noted reference, Section 5, "Proposed Alternative and Basis for Use," the second paragraph, states that "the primary basis for this relief request is historically good performance of the PIVs."

- (a) Please provide the historical data of good performance that supports this statement.
- (b) Please provide an explanation for how many successful PIV leakage tests will be required before the test frequency can be extended?

RAI RV-05-1:

Please define the length of time QCNPS has between refueling outages (e.g., 18 months or 24 months).

RAI RV-05-2:

Please describe the historical cumulative radiation exposure for removal and replacement of the main steam safety valves (MSSVs), and the expected radiation exposure using the proposed alternative method.

RAI RV-05-3:

The request describes IST results for the MSSVs from 1997 to the present. Please provide the IST results for the MSSVs, prior to 1997, if available.

RAI RV-05-4:

The request states that, "This alternative is consistent with the alternative provided in ASME Code Case OMN-17, 'Alternative Rules for Testing ASME Class 1 Pressure Relief/Safety Valves,' Section 1, 'Test Frequencies, Class 1 Pressure Relief Valves,' Paragraph (a) 72-month Interval." Please confirm that the alternative complies with paragraph (b) of Code Case OMN-17.

RAI RV-06-1:

It is stated in the alternative request that the removal and testing of additional valves due to sample expansion would delay unit startup from refueling outages by at least several days, and that this represents a significant hardship. Please describe why this would represent a significant hardship.

RAI RV-06-2:

The proposed alternative states that the dual function safety/relief valve, and at least half of the eight MSSVs, would be removed and tested during each reactor refueling outage. Proposed alternative RV-05 is requesting to only remove and test a minimum of 20 percent of the MSSVs during each reactor refueling outage. Please describe why the number of MSSVs to be removed and tested differs in the two alternative requests.

Mr. Michael J. Pacilio
 Senior Vice President
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Sincerely,
 / RA N.DiFrancesco for /

Brenda Mozafari, Senior Project Manager
 Plant Licensing Branch III-2
 Division of Operating Reactor Licensing
 Office of Nuclear Reactor Regulation
 Docket Nos. 50-254 and 50-265

Enclosure:
 Request for Additional Information

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