



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

November 28, 2012

Mr. Michael J. Pacilio  
President and Chief Nuclear Officer  
Exelon Nuclear  
4300 Winfield Road  
Warrenville, IL 60555

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNIT NOS. 2 AND 3, AND QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2 – SUPPLEMENTAL INFORMATION NEEDED FOR ACCEPTANCE OF REQUESTED LICENSING ACTION RE: FIFTH INTERVAL INSERVICE INSPECTION PROGRAM PLAN AND RELIEF REQUESTS, I5R-02, REQUEST FOR ALTERNATE RISK-INFORMED SELECTION AND EXAMINATION CRITERIA FOR EXAMINATION CATEGORIES B-F, B-J, C-F-1, AND C-F-2 PRESSURE PIPING WELDS (TAC NOS. ME9684, ME9685, ME9670, AND ME9671)

Dear Pacilio:

By two letters dated September 28, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML12275A069 and ML12275A070), Exelon Generation Company, LLC (Exelon, the licensee) submitted their fifth interval inservice inspection (ISI) program and relief requests (RRs) for Dresden Nuclear Power Station, Unit Nos. 2 and 3, and Quad Cities Nuclear Power Station, Units 1 and 2 (Dresden and Quad Cities). The proposed RR would allow Dresden and Quad Cities to use the Electric Power Research Institute Tropical Report 112657, Revision B-A, "Revised Risk-Informed Inservice Inspection Evaluation Procedure," dated December 1999, as an alternative to the American Society of Mechanical Engineers, Section XI, Code examination requirements for ISI of Class 1 and 2 piping welds (Categories B-F, B-J, C-F-1, and C-F-2) along with two enhancements to provide acceptable level of quality and safety required by Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(a)(3)(i).

The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of the RRs. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plants.

Pursuant to 10 CFR 50.55a(a)(3)(i), the applicant shall demonstrate that the proposed alternatives would provide an acceptable level of quality and safety, or that compliance with the specified requirements of 10 CFR 50.55a would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety.

The NRC staff has reviewed your application and concluded that the information delineated in the enclosure to this letter is necessary to enable the NRC staff to make an independent

M. Pacilio

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assessment regarding the acceptability of the RRs in terms of regulatory requirements and the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that Exelon supplement the application to address the information requested in the enclosure by November 29, 2012. This will enable the NRC staff to begin its detailed technical review. If the information responsive to the NRC staff's request is not received by the above date, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its review activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

The information requested and associated time frames in this letter were discussed with your staff on November 15, 2012.

If you have any questions, please contact Carolyn Faria at (301) 415-4050.

Sincerely,

A handwritten signature in black ink, appearing to read "Brenda Mozafari", followed by a horizontal line and the word "for" written above it.

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

Docket Nos. 50-254, 50-265,  
50-237 and 50-249

Enclosure:  
Supplemental Information Request

cc w/encl: Distribution via Listserv

SUPPLEMENTAL INFORMATION NEEDED  
FOR  
ACCEPTANCE OF REQUESTED LICENSING ACTION  
EXELON GENERATION COMPANY, LLC  
DRESDEN NUCLEAR POWER STATION, UNIT NOS. 2 AND 3  
AND QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2  
DOCKET NOS. 50-237, 50-249, 50-254 and 50-265

By letters dated September 28, 2012, Exelon Generation Company, LLC (Exelon, the licensee) submitted their fifth interval inservice inspection (ISI) program and relief requests (RRs) for Dresden Nuclear Power Station, Unit Nos. 2 and 3, and Quad Cities Nuclear Power Station, Units 1 and 2 (Dresden and Quad Cities). The proposed RRs would allow Dresden and Quad Cities to use Electric Power Research Institute (EPRI) Tropical Report (TA) 12657, Revision B-A, "Revised Risk-Informed Inservice Inspection Evaluation Procedure," dated December 1999, as an alternative to the American Society of Mechanical Engineers (ASME) Section XI, Code examination requirements for ISI Class 1 and 2 piping welds (Categories B-F, B-J, C-F-1, and C-F-2), along with two enhancements: (1) the requirements of paragraph-2430, "Additional Examinations" contained in Code Case N-578-1 in lieu of the evaluation and sample expansion requirements in Section 3.6.6.2, "RI-ISI Selected Examinations" of EPRI TR-112657, and (2) provisions listed in Table 1, Examination Category R-A, "Risk-Informed Piping Examinations", to provide acceptable level of quality and safety required by Title 10 of the *Code of Federal Regulations* Section 50.55a(a)(3)(i). To complete its review, the U.S. Nuclear Regulatory Commission (NRC) staff requests the following supplemental information.

1. Exelon indicates that the risk impact assessment was completed as part of the original baseline RI-ISI program. The submittal further states that the change in risk was re-assessed, for the fifth interval, using the initial 1989 Edition, No Addenda ASME Section XI program. The acceptance criteria is described in Regulatory Guides 1.174 and 1.178. Please provide the risk results from the assessment that was made by comparing the proposed ISI program to the initial Section XI requirements that justify that the acceptance criteria is met for the fifth interval.

Enclosure

assessment regarding the acceptability of the RRs in terms of regulatory requirements and the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that Exelon supplement the application to address the information requested in the enclosure by November 29, 2012. This will enable the NRC staff to begin its detailed technical review. If the information responsive to the NRC staff's request is not received by the above date, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its review activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

The information requested and associated time frames in this letter were discussed with your staff on November 15, 2012.

If you have any questions, please contact Carolyn Faria at (301) 415-4050.

Sincerely,

**/ RA Nicholas DiFrancesco for /**

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

Docket Nos. 50-456, 50-457,  
 50-454 and 50-455

Enclosure:  
 Supplemental Information Request

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**ADAMS Accession No. ML12331A277**

**\*via e-mail**

OFFICE	NRR/DORL/LPL3-2/PE	NRR/DORL/LPL3-2/LA	NRR/DRA/APLA/BC*
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DATE	11/ 28 /12	11/ 28 /12	

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