



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

March 21, 2013

Mr. Michael J. Pacilio
Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2, FOLLOW-UP
REQUEST FOR ADDITIONAL INFORMATION REGARDING CHANGE TO
COMMITMENT FOR LICENSE RENEWAL (TAC NOS. ME8961 AND ME8962)

Dear Mr. Pacilio:

By letter to the U.S. Nuclear Regulatory Commission (NRC) dated May 18, 2012, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12173A423), Exelon Generation Company, LLC submitted a change to a commitment for license renewal regarding visual examinations for identifying aging effects at Quad Cities Nuclear Power Station, Units 1 and 2. Exelon letter dated November 29, 2012, (ADAMS Accession No. ML12335A056) responded to a Request for Additional Information (RAI) related to the change to the commitment for license renewal.

The NRC staff is reviewing your submittal and has determined that a follow-up RAI is required to complete the review. The specific information requested is addressed in the enclosure to this letter. During a RAI clarification call with members of your staff on March 4, 2013, it was agreed that you would provide a response within 60 days from the date of this letter. If you have any questions, please contact me by telephone at 301-415-4054 or by e-mail at Heather.Jones@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Heather M. Jones".

Heather M. Jones, Project Manager
Subsequent Renewal, Guidance,
and Operations Branch
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-254 and 50-265

Enclosure:
Request for additional information

cc w/encl: Listserv

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DISTRIBUTION:

See next page

ADAMS Accession No.: ML13064A059

*concurrence via email

OFFICE	PM:RSRG/DLR	LA:RPB2/DLR*	BC: RSRG /DLR	PM: RSRG /DLR
NAME	HJones	YEdmonds	YDiaz-Sanabria	HJones
DATE	3/ /2013	3/18/2013	3/21/2013	3/21/2013

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FOLLOW-UP REQUEST FOR ADDITIONAL INFORMATION
REGARDING CHANGE TO COMMITMENT FOR LICENSE RENEWAL
EXELON GENERATION COMPANY, LLC.
QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2
DOCKET NOS. 50-254 AND 50-265
LICENSE NOS. DPR-29 AND DPR-30

Background

Exelon letter dated November 29, 2012, (ADAMS Accession No. ML12335A056) responded to a Request for Additional Information (RAI) related to a change to a commitment for license renewal regarding visual examinations for identifying aging effects at Quad Cities Nuclear Power Station, Units 1 and 2. However, neither the commitment change letter nor RAI response provided sufficient detail to allow the staff to conclude that plant documents contain sufficient controls to ensure that the inspections will be adequate to manage the aging effects of a component such that its intended functions will be maintained consistent with the current licensing basis for the period of extended operation.

Issue

The staff did not find the response in part acceptable because:

- The response did not address how examination coverage was controlled.
- The staff is not clear on where critical inspection parameters are documented (e.g., work instructions, pre-job brief forms) based on the following:
 - While VT-1 and VT-3 certified personnel are trained on establishing appropriate lighting, resolution, and other critical inspection parameters to ensure that the aging effect can be identified, regional inspection personnel observed the performance of some of these inspections and did not find uniform compliance with appropriate lighting levels, angle of observation, and distance to the component.
 - Based on the observation of regional inspection personnel, the pre-job briefs did not consistently cover maximum direct examination distance, illumination, or use of white-light meter and/or use of a test card.

It is also not clear whether the plant document contains the specific inspection parameters or simply states that the inspection parameter should be covered during the pre-job brief.

- The response stated that, "since the examiner was required to identify all evidence of aging effects, no interpretation or evaluation by the individual was required. For these examinations, engineering personnel had the responsibility to evaluate the conditions identified by the examiner through the station Corrective Action Program." When conducting an ASME Code Section XI examination, evaluating the validity and acceptability of inspection results is the responsibility of a Level II or Level III certified individual. While the inspections are not conducted on ASME Code Section XI systems

ENCLOSURE

structures, and components (SSCs), the staff lacks sufficient information to conclude that the engineers are adequately trained to interpret inspection results and determine those that are non-conforming.

- Most of the statements related to justifying that the methods used for license renewal visual examinations outside of ASME Code Section XI examinations will be effective in detecting aging were made in the past tense. The staff is not clear that these methods will be continued throughout the period of extended operation.

Request

- 1) State what plant document(s) will include the following specific critical inspection parameters to ensure consistent performance of each examination throughout the period of extended operation:
 - a) Minimum examination coverage area
 - b) Maximum distance from the subject SSC for which the examiner can conduct the examination
 - c) Angle of observation
 - d) Minimum lighting requirements and how they are verified
- 2) If the plant documents do not cite specific inspection parameters, but rather rely on the knowledge base of the inspector and individual conducting the pre-job brief, state the basis for how inspections are consistently effectively conducted.
- 3) State how engineers that are not certified as Level II or Level III personnel are trained in regard to inspection and examination activities such that they can appropriately evaluate the conditions identified by the examiner.
- 4) For future periodic inspections, verify that all of the details in Section A, "Overview," and program-specific details in Section B, "Program Specific Information Related to the Effectiveness of Visual Examinations," in the RAI response apply, or identify which statements do not apply.

Letter to Mr. Pacilio from H. Jones dated March 21, 2013

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HJones

YDiaz-Sanabria