



SVP-13-037

June 19, 2013

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: Regulatory Commitment Change Summary Report

Enclosed is the Exelon Generation Company, LLC (EGC) Regulatory Commitment Change Summary Report for Quad Cities Nuclear Power Station (QCNPS). The enclosure reports changes processed during the period June 1, 2012, through May 31, 2013. Revisions to commitments were processed in accordance with Nuclear Energy Institute (NEI) 99-04, "Guidelines for Managing NRC Commitment Changes."

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

Respectfully,

A handwritten signature in black ink that reads "Tim Hanley".

Tim Hanley
Site Vice President
Quad Cities Nuclear Power Station

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

A 001
NRR

QCNPS Regulatory Commitment Change Summary Report
June 1, 2012 - May 31, 2013

Commitment Change Tracking Number: 12-02

Source Document: Letter from J. Hosmer to USNRC dated March 15, 1997

Change Approved On: 7/23/2012

Original Commitment Description

In response to NRC Generic Letter 96-05, Quad Cities committed to implement the Joint Owners Group (JOG) Program for Motor Operated Valve (MOV) periodic verification in accordance with MPR-1807 and MPR-2524-A Rev. 1 (Final Report).

Revised Commitment Description

At Quad Cities a small number (two) of the GL 96-05 MOV program valves are not included in the final JOG Program Report (MPR-2524-A) such that JOG MOV evaluations for service related degradation effects are not applicable. GL 96-05 MOVs not within the scope of the JOG MOV Final Report are referred to as JOG Class D MOVs. Therefore, Quad Cities must apply alternative methods to address service related degradation that were not included in the NRC approved JOG MOV Program.

Justification For Revision

The JOG Class D MOVs have been installed at Quad Cities since 1996, Quad Cities is following the JOG Program requirements to develop and justify an alternative method to address service related degradation. While this method is not reviewed and approved by the NRC, an engineering technical evaluation has been performed in order to technically justify its use.

QCNPS Regulatory Commitment Change Summary Report
June 1, 2012 - May 31, 2013

Commitment Change Tracking Number: 12-03

Source Document: RS-03-181

Change Approved On: 10/1/2012

Original Commitment Description

In Exelon letter RS-03-181 dated October 3, 2003, concerning a Request for Additional Information (RAI) for the review of the License Renewal Applications for Quad Cities and Dresden, under the RAI B1.4 response (page 57), the NRC requested Exelon to: "...identify the D/QCNPS vessel ID attachment welds, weld materials, and the welds that are furnace-sensitized. Also identify the attachment welds that will be inspected with enhanced VT-1 (EVT-1)". The Exelon reply is contained in a table on page 58 of RS-03-181. This table specifically lists the requested attributes for each of the Vessel ID attachments at both Quad Cities and Dresden; the table includes the weld materials used, whether the attachment is "Furnace-Sensitized," and the inspection method for each weld. For both Quad Cities and Dresden, the inspection methods listed are EVT-1 for all ID attachment welds, except for the Surveillance Sample Holder (brackets) which are listed as VT-1.

Revised Commitment Description

The inspection methods listed on the table on page 58 of RS-03-181 are modified as follows for Quad Cities 1 & 2:

- *Steam Dryer Lower Guide Rod Bracket, reclassify as VT-3.
- *Surveillance Sample Holder (Brackets), reclassify as Upper Brackets VT-3, Lower Brackets remain VT-1.
- *Steam Dryer Support Bracket, reclassify as VT-3.
- *Feedwater Sparger Bracket, reclassify as VT-3.

Justification For Revision

Steam Dryer Lower Guide Rod Bracket:

Per BWRVIP-48-A, Table 3.2 (page 3-6) for Guide Rod Attachments the Inspection Strategy states: "No additional inspections are required above those specified in a plant's ASME Section XI program." Per ASME Section XI Table IWB-2500-1 B13.30 the inspection requirements for Guide Rod Attachments are VT-3 every 10 years. Therefore, EVT-1 inspections are not required or

QCNPS Regulatory Commitment Change Summary Report

June 1, 2012 - May 31, 2013

warranted.

Surveillance Sample Holder (Brackets):

Per BWRVIP-48-A, Table 3.2 (page 3-6) for Surveillance Sample Holder Attachments the Inspection Strategy states: "No additional inspections are required above those specified in a plant's ASME Section XI program." Per ASME Section XI Table IWB-2500-1 B13.30 the inspection requirements for Upper Surveillance Sample Holder (i.e. non-Beltline region) attachments are VT-3 every 10 years. Therefore, EVT-1 inspections are not required or warranted. Additionally, the table should specifically list the Upper Brackets (VT-3) and Lower Brackets (VT-1) as separate line items to provide clarity.

Steam Dryer Support Bracket:

Per BWRVIP-48-A, Table 3.2 (page 3-6) for Steam Dryer (support and hold down) Attachments (that are not furnace-sensitized or Alloy 182 material) the Inspection Strategy states: "No additional inspections are required above those specified in a plant's ASME Section XI program." Per ASME Section XI Table IWB-2500-1 B13.30 the inspection requirements for Guide Rod Attachments are VT-3 every 10 years. Therefore, EVT-1 inspections are not required or warranted.

Feedwater Sparger Bracket:

Per BWRVIP-48-A, Table 3.2 (page 3-6) for Feedwater Sparger Attachments (that are not furnace-sensitized or Alloy 182 material) the Inspection Strategy states: "No additional inspections are required above those specified in a plant's ASME Section XI program." Per ASME Section XI Table IWB-2500-1 B13.30 the inspection requirements for Guide Rod Attachments are VT-3 every 10 years. Therefore, EVT-1 inspections are not required or warranted.

QCNPS Regulatory Commitment Change Summary Report

June 1, 2012 - May 31, 2013

Commitment Change Tracking Number: 12-04

Source Document: LER 2-97-005-01

Change Approved On: 1/18/2013

Original Commitment Description

In LER 2-97-005-01, Quad Cities committed to implement procedure changes revising the parts replacement process to ensure that any differences in form, fit, and function are reviewed by Design Engineering, and to ensure that these differences are adequately addressed.

Revised Commitment Description

The commitment will be deleted.

Justification For Revision

The commitment required an additional review by Design Engineering for alternate part evaluations. This was implemented in 1997, and during this timeframe part evaluations were performed under procedure MS-AA-300, "Procurement Engineering Support Activities," and MS-AA-301, "Procurement / Safety Classification." Quad Cities implemented a site-specific procedure to include this additional review. The current procedures used by Procurement (i.e., SM-AA-300 and SM-AA-300-1001) do not include this requirement for Quad Cities; however, Quad Cities Engineering continued to include Design Engineering for review to meet the original commitment.

The current fleet standard procedures now provide explicit details for performing Item Equivalency Evaluations (IEEs). IEE evaluations are performed and documented on a standard form provided in procedure SM-AA-300-1001-F-01, which require answers to a specific set of questions not included in the original procedures. The current process assures a rigorous technical review.

In addition, procedure HU-AA-1212 provides a Technical Task Risk Rigor Assessment to determine if an additional "third party" review is required, and this assessment is required as part of the pre-job brief for each IEE evaluation. An Engineering Quality Technical Review (QTR) is also performed on a random sample of IEEs. This process started in 2007 and establishes an additional oversight

QCNPS Regulatory Commitment Change Summary Report

June 1, 2012 - May 31, 2013

mechanism for procurement products. The IEEs produced by Procurement Engineering are also score carded (i.e., 'graded') to identify strengths and weaknesses in the evaluation process.

In conclusion, since the commitment was established, new procedures and processes, including self assessments and independent reviews, have been implemented. These changes demonstrate that this commitment is no longer required.

QCNPS Regulatory Commitment Change Summary Report
June 1, 2012 - May 31, 2013

Commitment Change Tracking Number: 12-05

Source Document: License Renewal SE (NUREG-1796)

Change Approved On: 1/31/2013

Original Commitment Description

During the License Renewal Application (LRA) process, Dresden and Quad Cities UFSAR Section 9.1.4 was reviewed by the NRC to determine whether crane and hoist structural components - within the scope of License Renewal (LR) and subject to an Aging Management Review (AMR) - had been identified in accordance with 10 CFR 54.4 and 54.21(a)(1).

As a result of this review, the NRC requested in Request for Additional Information (RAI) 2.4-9 to clarify the treatment of cranes and hoists.

The table provided in RAI response 2.4-9 specifically listed the attributes for each crane and whether each was in scope or out of scope. Under the section "Quad Cities Reactor Building - In Scope" the following crane was listed as one of the cranes in scope: "Unit 1 Reactor Building (Elevation 666') Jib crane (does not exist on Unit 2)".

Revised Commitment Description

Based on poor material condition of the Unit 1 Reactor Building (Elevation 666') Jib crane, a decision was made to physically remove the equipment from the plant instead of implementing extensive repairs to demonstrate compliance with the aging management program.

The crane described in LR Safety Evaluation Section 2.4.14 and RAI 2.4-9, [i.e., "Unit 1 Reactor Building (Elevation 666') Jib crane (does not exist on Unit 2)"] has been removed from the plant; therefore, this component no longer requires aging management.

Justification For Revision

Issue Report (IR 679879) was written in October 2007 to document the unsafe condition of the Unit 1 Reactor Building (Elevation 666') Jib Crane.

QCNPS Regulatory Commitment Change Summary Report
June 1, 2012 - May 31, 2013

During preparations for the Phase II LR Inspection, IR 1295592 was written documenting that the crane was referenced in the LR Safety Evaluation and because of poor material condition a recommendation was made to PHC (and Station Safety Committee) to remove the crane from the plant instead of incurring costly repairs.

Since the crane is listed in the LR documentation, and is no longer installed in the plant, the commitment needs to be modified to reflect this removal.