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SVP-19-053

July 11, 2019

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, 2018, through May 31, 2019. 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 Mrs. Sherrie Grant at (309) 227-4833.

Respectfully,

A handwritten signature in black ink, appearing to read "K. S. Ohr", written over a light blue horizontal line.

Kenneth S. Ohr
Site Vice President
Quad Cities Nuclear Power Station

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

QCNPS Regulatory Commitment Change Summary Report
June 1, 2018 to May 31, 2019

Commitment Change Tracking Number: 18-01

Source Document: UFSAR Appendix A

Change Approved On: 10/15/2018

Original Commitment Description

The site CASS inspection program, as originally implemented for License Renewal, specified the following to satisfy the License Renewal commitment:

Per Quad Cities/Dresden License Renewal Application B1.10 perform an EVT-1 examination on the accessible surfaces on one of each of the following components every refueling outage:

- Fuel Support Piece
- CRGT Base
- JP Mixer Flange
- JP Mixer Flare
- JP Mixer Ring
- JP Inlet-Mixer Nozzle
- JP Inlet-Mixer Elbow

EC 618510 documented a change in frequency to every two (2) refueling outages, which is the current inspection frequency.

Revised Commitment Description

(Eliminate the inspection of these CASS Components.)

Justification For Revision

BWRVIP-234, "BWR Vessel and Internals Project, Thermal Aging and Neutron Embrittlement Evaluation of Cast Austenitic Stainless Steels for BWR Internals", was issued in 2009 and was approved for use by the NRC in 2016. BWRVIP-234 provides the technical evaluation and inspection guidance for CASS components. BWRVIP-234 recommended no inspection of any CASS components due to a low probability of

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failure and assessment of low risk. The NRC final Safety Evaluation (SE) for BWRVIP-234 specified new conditions requiring a plant specific fluence assessment of the CASS components prior to implementing BWRVIP-234 guidance. The NRC SER was transmitted via BWRVIP Letter 2016-075, "Final NRC Safety Evaluation of BWRVIP-234, BWR Vessel and Internals Project, Thermal Aging and Neutron Embrittlement Evaluation of Cast Austenitic Stainless Steels for BWR Internals", dated July 8, 2016. The SER concluded that BWRVIP-234 was acceptable for use with the condition that a plant-specific fluence assessment must demonstrate that the projected neutron fluence is bounded by the maximum fluence (6×10^{20} n/cm²) stated in Table 3-3 of BWRVIP-234 for each CASS component to which the guidance in BWRVIP-234 is applied.

Finally, BWRVIP Letter 2017-030, "BWRVIP Assessment of BWR Orificed Fuel Support Aging Management", dated February 23, 2017, provides a technical assessment of the CASS Orificed Fuel Support (OFS) components in relationship to the inspection requirements provided in NUREG-1801 Rev 2. This assessment provides a technical basis that can be applied by utility members to exempt the CASS OFS components from augmented examination based on a technical evaluation that indicates low tensile stresses and low risk for an adverse effect on safety due to any loss of fracture toughness.

EC 620251 provides the technical basis to eliminate CASS inspections during the current PEO based on the above.

Reference Quad Cities AT Item 101562.13.01.

QCNPS Regulatory Commitment Change Summary Report
June 1, 2018 to May 31, 2019

Commitment Change Tracking Number: 18-02
Source Document: SVP-98-152 and SVP-98-168
Change Approved On: 8/30/2018

Original Commitment Description

Quad Cities station established administrative technical requirements (ATRs) to manage the risk of post-fire safe shutdown equipment being out of service. The ATRs are implemented in procedure QCAP 1500-02, which specifies allowable outage times for equipment using in QCARP procedures. (This is from a larger group of procedures associated with modifications associated with Appendix R.)

Revised Commitment Description

Fire risk during maintenance rule (a)(4) activities is considered in the work control process. The station assesses risk with Quad Cities' Fire Probabilistic Risk Assessment and manages risk with various procedures and other documents. These procedures include WC-AA-101, WC-AA-101-1006, and OP-AA-201-012-1001.

Justification For Revision

Fire risk during maintenance rule (a)(4) activities is accounted for in the station's risk management process in accordance with NUMARC 93-01 Rev 4A, an approach that is accepted by the NRC in Reg Guide 1.160. ATRs are not endorsed in contemporary NRC guidance.