

From: Kuntz, Robert
Sent: Friday, July 1, 2022 6:14 AM
To: Steinman, Rebecca L:(Constellation Nuclear)
Subject: RAI RE: Alternative RV-11, Code Case OMN-28

In a letter dated February 17, 2022, Constellation Energy Generation, LLC (Constellation, the licensee) submitted several Alternative Requests for the Inservice Testing (IST) Program at Quad Cities Nuclear Power Station Units 1 and 2 (Quad Cities), to the U.S. Nuclear Regulatory Commission (NRC) (Agencywide Documents Access and Management System Accession Nos. ML22048B569). The letter included Alternative Request RV-11 related to Code Case OMN-28. The Nuclear Regulatory Commission (NRC) staff has determined that additional information is required to complete its review. The NRC staff's draft request for additional information (RAI) is included. The NRC staff expects a response on August 1, 2022, which is 30 days from this message .

Robert Kuntz
Senior Project Manager
NRC/NRR/DORL/LPL3
(301) 415-3733

REQUEST FOR ADDITIONAL INFORMATION

QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2

ALTERNATIVE RV-11

EMIB-RAI-1:

Background: Quad Cities Alternative Request RV-11 proposes that ASME OM Code Case OMN-28 be implemented in lieu of the requirements in ASME OM Code, Subsection ISTC, paragraph ISTC-3700, for the remote position verification of valves at Quad Cities.

Regulatory Requirements:

The NRC regulations in Section 55a, "Codes and standards," in Part 50, "Domestic Licensing of Production and Utilization Facilities," in Title 10, "Energy," of the *Code of Federal Regulations* (10 CFR 50.55a) in paragraph (z), "Alternatives to codes and standards requirements," state the following:

Alternatives to the requirements of paragraphs (b) through (h) of this section or portions thereof may be used when authorized by the Director, Office of Nuclear Reactor Regulation. A proposed alternative must be submitted and authorized prior to implementation. The applicant or licensee must demonstrate that:

- (1) *Acceptable level of quality and safety.* The proposed alternative would provide an acceptable level of quality and safety; or
- (2) *Hardship without a compensating increase in quality and safety.* Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Request:

In that the NRC is being requested to authorize an alternative under 10 CFR 50.55a(z) to allow components to deviate from the 10 CFR 50.55a regulatory requirements, identify the valves that are within the scope of Alternative Request RV-11 at Quad Cities. This information may be provided by submittal of the Sixth 10-Year IST Program Plan for Quad Cities that identifies valves with position indication requirements, or by a list of the specific valves within the scope of Alternative Request RV-11.

Hearing Identifier: NRR_DRMA
Email Number: 1694

Mail Envelope Properties (SA9PR09MB4640F131107BB97FFA91123499BD9)

Subject: RAI RE: Alternative RV-11, Code Case OMN-28
Sent Date: 7/1/2022 6:14:09 AM
Received Date: 7/1/2022 6:14:00 AM
From: Kuntz, Robert

Created By: Robert.Kuntz@nrc.gov

Recipients:
"Steinman, Rebecca L:(Constellation Nuclear)" <Rebecca.Steinman@constellation.com>
Tracking Status: None

Post Office: SA9PR09MB4640.namprd09.prod.outlook.com

Files	Size	Date & Time
MESSAGE	2823	7/1/2022 6:14:00 AM

Options
Priority: Normal
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date: