

From: Robert Kuntz
Sent: Wednesday, December 14, 2022 8:13 AM
To: rebecca.steinman@constellation.com
Subject: RE: DRAFT Request for Additional Information RE: Quad Cities Alternative I6R-09 (EPID L-2022-LLR-0059)

By letter dated July 25, 2022 (Agencywide Documents and Access Management System (ADAMS) Accession ML19353C619), Constellation Energy Generation (the licensee) submitted alternative request I6R-09, Revision 0, in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(z)(1) requesting to continue to use the requirements of the 2013 Edition of American Society of Mechanical Engineers (ASME) Code, Section XI, for nondestructive examination (NDE) activities during the first period of the sixth 10-year ISI interval of the Quad Cities Nuclear Power Station, Units 1 and 2 (Quad Cities). To complete its review, the NRC staff has determined that additional information is required to complete its review. Below is the NRC staff's request for additional information (RAI). The staff anticipates a response to the RAI by January 13, 2023. If Constellation requires additional time to response contact me to discuss.

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NRC/NRR/DORL/LPL3
(301) 415-3733

REQUEST FOR ADDITIONAL INFORMATION

ALTERNATIVE REQUEST I6R-09, REVISION 0,

REGARDING CONTINUED APPLICATION OF THE 2013 EDITION OF ASME CODE,
SECTION XI FOR NDE ACTIVITIES

CONSTELLATION ENERGY GENERATION, LLC

QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2

DOCKET NUMBERS 50-254 AND 50-265

EPID: L-2022-LLR-0059

1. Confirm that, even with alternative request I6R-09, Revision 0, the length of the Quad Cities fifth and sixth 10-year ISI intervals will not be affected, and the requirements of ASME Code, Section XI, IWA-2430, "Inspection Intervals," will be complied with. Provide start and end dates of the fifth and sixth 10-year ISI intervals.
2. The request stated, in part, "... CEG will comply with all related NDE requirements of the 2013 Edition of ASME Section XI, as they interface with the General Requirements of IWA-1000 as well as certain Mandatory and Nonmandatory Appendices ..."
 - a. In the submittal, neither the related NDE requirements of the 2013 Edition of ASME Code, Section XI, nor the related mandatory and nonmandatory appendices were

- identified and listed. Provide list of related NDE requirements of the 2013 Edition of ASME Code, Section XI, and related mandatory and nonmandatory appendices that will be complied in the first period of sixth 10-year ISI interval.
- b. The 2017 Edition of ASME Code, Section XI has Appendix XI, "Repair/Replacement Activities for Class 3 Polyethylene Piping," but the 2013 Edition does not. Discuss how polyethylene piping NDE activities will be affected by this alternative request in the first period of sixth 10-year ISI interval.
 - c. Provide list of NDE requirements in the 2017 Edition of ASME Code, Section XI, as compared to the 2013 Edition that are different, newly added, and/or more stringent. Provide justifications that not complying with any one of these NDE requirements of the 2017 Edition in the first period of the sixth 10-year ISI interval will impact structural integrity.
3. Discuss whether any of the prior relief and alternative requests approved by NRC will be affected by this alternative request.

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