



SVP-24-054

September 11, 2024

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Quad Cities Nuclear Power Station, Unit 1
Renewed Facility Operating License No. DPR-29
NRC Docket No. 50-254

Subject: Deviation from BWR Vessel and Internals Project (BWRVIP)
Guidelines - Inspection of Top Guide Rim Welds

Reference: 1) BWRVIP-26A, BWR Top Guide Inspection and Flaw Evaluation
Guidelines. EPRI, Palo Alto, CA: November 2004. 1009946
2) BWRVIP-94, Revision 4: BWR Vessel and Internals Project, Program
Implementation Guide. EPRI, Palo Alto, CA: 2020. 3002019689

Constellation Generation Company, LLC (EGC) is a member of the BWR Vessel and Internals Project (BWRVIP) and has committed to implementing BWRVIP products and to providing notification to the NRC staff if an applicable aspect of a BWRVIP product will not be implemented.

In accordance with BWRVIP-26A (Reference 1), all accessible locations of the Top Guide Rim Welds are required to be inspected every 4-years. A deviation disposition was performed to document an evaluation of missed re-inspection of flawed cells for the top guide rim weld (Location 11). These flawed locations were last inspected in Q1R25 (2019). The purpose of this notification is to communicate that a deviation disposition was performed.

For Quad Cities, 20 top guide cell locations (5-cells at each of the four-cardinal azimuths) are typically accessible during a normal refuel outage. Quad Cities Unit 1 has known flaws in some of these accessible Top Guide Rim Weld locations. A site-specific vendor flaw evaluation assumes any cell with a known circumferential flaw is completely failed and does not contribute to the structural integrity of the rim weld. The vendor flaw evaluation specifies the number and orientation of unflawed cells to ensure structural integrity is maintained. This was used to justify that inspection of only the unflawed cells was adequate. However, the past deferral of the ten flawed cells is outside the inspection guidance contained in BWRVIP-26A, and a deviation is warranted.

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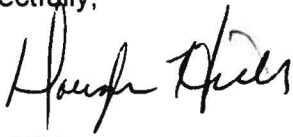
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A Deviation Disposition was prepared in accordance with BWRVIP-94, Revision 4 (Reference 2). The Deviation Disposition contains an evaluation documenting the acceptability of not performing the "needed" Top Guide Rim Weld inspections in accordance with BWRVIP-26A. The evaluation concluded that it is technically justified to deviate from the inspection requirements of BWRVIP-26A, for the Quad Cities Unit 1 Top Guide Rim Weld.

This letter is being transmitted for your information in accordance with Section 3.5 of BWRVIP-94 Revision 4. This letter is to notify the NRC of the deviation from "needed" BWRVIP guidance. No actions or approvals on the part of the NRC are required as a result of this letter.

There are no regulatory commitments contained in this letter. Should you have any questions, please contact Mr. Michael Swartz at (815) 708-5434 or Dr. Kirsten Genson (765) 430-7929.

Respectfully,

A handwritten signature in black ink, appearing to read "Doug Hild", is written over the typed name.

Doug Hild
Site Vice President
Quad Cities Nuclear Power Station

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