



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 30, 2025

David P. Rhoades
Senior Vice President
Constellation Energy Generation, LLC
President and Chief Nuclear Officer (CNO)
Constellation Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2 – ALTERNATIVE
REQUEST RV-08, REVISION 1, SIXTH INTERVAL INSERVICE TESTING
PROGRAM (EPID L-2024-LLR-0060)

Dear David Rhoades:

By letter dated August 20, 2024 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML24233A213) as supplemented by a letter dated December 3, 2024 (ML24338A265), Constellation Energy Generation, LLC (the licensee) submitted Revision 1 to Alternative Request RV-08 to the U.S. Nuclear Regulatory Commission (NRC) in lieu of specific inservice testing (IST) requirements in the 2017 Edition of the American Society of Mechanical Engineers (ASME) Operation and Maintenance of Nuclear Power Plants, Division 1, OM Code: Section IST (OM Code) during the sixth interval IST program at the Quad Cities Nuclear Power Station (QCNPS), Units 1 and 2.

Specifically, pursuant to subparagraph (1) in paragraph (z), "Alternatives to codes and standards requirements," of section 55a, "Codes and standards," in part 50, "Domestic Licensing of Production and Utilization Facilities," to Title 10, "Energy," of the *Code of Federal Regulations* (10 CFR) 50.55a(z)(1), the licensee requested to implement proposed Revision 1 to Alternative Request RV-08 for certain safety relief valves (SRVs) at QCNPS, Units 1 and 2, on the basis that the proposed alternative will provide an acceptable level of quality and safety.

The NRC staff finds that the licensee's proposal described in Revision 1 to Alternative Request RV-08 to extend the required test interval for the SRVs listed in Table 1 of this safety evaluation from 24 months to 48 months from installation in the plant, combined with (1) the licensee's SRV Best Practices Maintenance Program, (2) the ASME OM Code requirement to test Class 1 pressure relief valves at least once every 5 years beginning from the date of the as-left set pressure test for each valve, and (3) the ASME OM Code requirement to test valves removed from service within 12 months of removal from the system, will provide an acceptable level of quality and safety. Accordingly, the NRC staff concludes that the licensee has adequately addressed the regulatory requirements set forth in 10 CFR 50.55a(z)(1) for Revision 1 to Alternative Request RV-08. Therefore, the NRC staff authorizes the use of Revision 1 to Alternative Request RV-08 for the applicable SRVs within the scope of the request for the sixth interval IST program at QCNPS, Units 1 and 2, which began on August 18, 2023.

All other ASME OM Code requirements as incorporated by reference in 10 CFR 50.55a for which relief or an alternative was not specifically requested, and granted or authorized (as appropriate), in the subject request remain applicable.

If you have any questions, please contact the Project Manager, Robert Kuntz, at 301-415-3733 or by e-mail to Robert.Kuntz@nrc.gov.

Sincerely,

Ilka Berrios, Branch Chief
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-254 and 50-265

Enclosure:
Safety Evaluation

cc: Listserv



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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

ALTERNATIVE REQUEST RV-08, REVISION 1

SIXTH INTERVAL INSERVICE TESTING PROGRAM

CONSTELLATION ENERGY GENERATION, LLC

QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2

DOCKET NOS. 50-254 AND 50-265

EPID L-2024-LLR-0060

1.0 INTRODUCTION

By a letter dated August 20, 2024 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML24233A213) as supplemented by a letter dated December 3, 2024 (ML24338A265), Constellation Energy Generation, LLC (CEG, the licensee) submitted Revision 1 to Alternative Request RV-08 to the U.S. Nuclear Regulatory Commission (NRC) in lieu of specific inservice testing (IST) requirements in 2017 Edition of the American Society of Mechanical Engineers (ASME) Operation and Maintenance of Nuclear Power Plants, Division 1, OM Code: Section IST (OM Code) during the sixth interval IST program at the Quad Cities Nuclear Power Station (QCNPS), Units 1 and 2.

Specifically, pursuant to subparagraph (1) in paragraph (z), "Alternatives to codes and standards requirements," of Section 55a, "Codes and standards," in part 50, "Domestic Licensing of Production and Utilization Facilities," to Title 10, "Energy," of the *Code of Federal Regulations* (10 CFR) 50.55a(z)(1), the licensee requested to implement proposed Revision 1 to Alternative Request RV-08 for certain safety relief valves (SRVs) at QCNPS, Units 1 and 2, on the basis that the proposed alternative will provide an acceptable level of quality and safety. The sixth interval IST program at QCNPS, Units 1 and 2, began on August 18, 2023.

2.0 REGULATORY EVALUATION

The NRC regulations in 10 CFR 50.55a(f)(4), "Inservice testing standards requirement for operating units," state, in part, that throughout the service life of a boiling or pressurized water-cooled nuclear power facility, pumps and valves that are within the scope of the ASME OM Code must meet the IST requirements (except design and access provisions) set forth in the ASME OM Code and addenda that become effective subsequent to editions and addenda specified in 10 CFR 50.55a(f)(2) and (3) and that are incorporated by reference in 10 CFR 50.55a(a)(1)(iv), to the extent practical within the limitations of design, geometry, and materials of construction of the components.

Enclosure

The NRC regulations in 10 CFR 50.55a(z), "Alternatives to codes and standards requirements," state that alternatives to the requirements of 10 CFR 50.55a(b) through (h) 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.

3.0 TECHNICAL EVALUATION

The information provided by the licensee in support of the request for an alternative to IST requirements in the ASME OM Code, as incorporated by reference in 10 CFR 50.55a, has been evaluated and the bases for disposition are documented in this safety evaluation (SE).

3.1 Licensee's Revision 1 to Alternative Request RV-08

Applicable ASME OM Code Edition

The applicable Code of Record for the sixth interval IST program at QCNPS, Units 1 and 2, is the 2017 Edition of ASME OM Code as incorporated by reference in 10 CFR 50.55a.

Applicable ASME OM Code Components

In its submittal, the licensee proposed alternative testing for the Main Steam Safety/Relief Valves at QCNPS, Units 1 and 2, listed in Table 1:

Table 1

Component	Description	Class	Category
1-0203-003A	MS-3A SRV (Target Rock)	1	C
2-0203-003A	MS-3A SRV (Target Rock)	1	C

Applicable ASME OM Code Requirements

The IST requirements in the ASME OM Code, 2017 Edition, as incorporated by reference in 10 CFR 50.55a, related to this alternative request are as follows:

ASME OM Code, Division 1, Mandatory Appendix I, "Inservice Testing of Pressure Relief Devices in Water-Cooled Reactor Nuclear Power Plants," paragraph I-1320, "Test Frequencies, Class 1 Pressure Relief Valves," states:

- (a) *5-Yr Test Interval.* Class 1 pressure relief valves shall be tested at least once every 5 yr [years], starting with initial electric power generation. No maximum limit is specified for the number of valves to be tested within each interval; however, a minimum of 20% of the valves from each valve group shall be tested within any 24-month interval. This 20% shall consist

of valves that have not been tested during the current 5-yr interval, if they exist. The test interval for any installed valve shall not exceed 5 yr. The 5-yr test interval shall begin from the date of the as-left set-pressure test for each valve.

- (b) *Replacement With Pretested Valves.* The Owner may satisfy testing requirements by installing pretested valves to replace valves that have been in service, provided that
 - (1) for replacement of a partial complement of valves, the valves removed from service shall be tested prior to resumption of electric power generation or
 - (2) for replacement of a full complement of valves, the valves removed from service shall be tested within 12 months of removal from the system

Proposed Alternative and Basis for Use

The licensee proposes that the ASME OM Code, Division 1, Mandatory Appendix I, subparagraph I-1320(a), minimum test sampling interval for the group of one SRV at QCNPS, Units 1 and 2, be extended from 24 months to 48 months for each valve. The proposed alternative does not alter the requirement to test Class 1 pressure relief valves at least once every 5 years beginning from the date of the as-left set pressure test for each valve. In addition, the proposed alternative does not alter the requirement of subparagraph I-1320(b)(2) to test valves removed from service within 12 months of removal from the system.

The licensee states that a fleet-wide SRV Best Practices Maintenance Program was implemented in 2010 with several enhancements incorporated between 2010 and 2014 that resulted in improved SRV setpoint drift performance. The licensee reports that the SRV Best Practices Maintenance Program is comprised of methods and philosophies concerning maintenance, inspection and techniques which uses the equipment manufacturer's recommended maintenance practices and enhancements. The SRV best practices are developed from the application of the Electric Power Research Institute/Nuclear Maintenance Applications Center (EPRI/NMAC) Safety and Relief Valve Testing and Maintenance Guide and fleet operational experience. The SRV best practices have been implemented through the oversight of the valve vendor's test and rebuild processes. Major program elements include specific performance and inspection criteria and maintenance steps that exceed original equipment manufacturer (OEM) specifications and/or industry established guidelines. The main program elements include: (1) spring testing, (2) lapping techniques and tools, (3) set pressure adjustment methodology precision, (4) average delay time (ADT) trending, and (5) internal component condition variations. Collectively, use of these elements has supported a trend in improved setpoint retention of SRVs in service at QCNPS, Units 1 and 2.

The licensee has established an engineering program document to provide governance over the approved vendor SRV maintenance procedures, to define the program elements, and to establish performance tracking and trending guidelines. This program document and the approved vendor procedures are updated to incorporate advances in technology and operating experience from its fleet, the OEM, and the industry. Major elements of the program described by the licensee are summarized below.

Spring Testing

Spring testing is performed periodically based on valve type. The SRV Best Practices Maintenance Program requires that the spring characteristics meet physical dimension requirements that are tighter than previous acceptance criteria based on operating experience.

Lapping Techniques and Tools

The lapping technique includes multiple lapping passes that develop tighter tolerances using a CEG-designed lapping tool based on internal fleet operating experience. The SRV Best Practices Maintenance Program requires this additional lapping to meet the tighter seat leakage tightness criteria.

Set Pressure Adjustment Methodology Precision

The SRV set pressure adjustment process includes a spring adjustment factor methodology for the first set pressure adjustment. The SRV Best Practices Maintenance Program includes a calculated spring adjustment factor based on the SRV set pressure adjustment during the pre-certification testing and CEG operating experience.

Average Delay Time (ADT) Trending

For the Target Rock 3-Stage SRVs, the ADT measures the time between the pilot valve opening and the main disk opening. The SRV Best Practices Maintenance Program has trended the ADTs for the Target Rock 3-Stage SRVs for determining if additional maintenance should be performed. The program includes a tighter tolerance than the industry standard criteria for ADT. An SRV with an ADT value outside this criterion is further evaluated for additional maintenance prior to installation.

Internal Component Condition Variations

The SRV inspection and maintenance processes include additional inspections for internal components with criteria that are more restrictive than previous acceptance criteria based on internal fleet operating experience. Specifically, for the Target Rock 3-Stage SRVs, tighter tolerances are applied to the pilot abutment and preload gaps.

In addition, the licensee's procedural guidance for the Best Practices Maintenance Program assigns the fleet SRV Program Engineer the following responsibilities:

- Develop, implement, and update the SRV Best Practices Maintenance Program;
- Maintain awareness of industry SRV issues;
- Identify and investigate opportunities for program improvements;
- Interface with EPRI, Safety Relief Valve Users Group (SRVUG), and Target Rock Users Group (TRUG).

The licensee has performed an assessment of the performance of the QCNPS, Units 1 and 2, Target Rock SRVs. This assessment reviewed as-left/as-found set pressure data since 1998

and identified (1) whether the valves' set pressure drifted up or down, and (2) the absolute set pressure changes between tests. Based on the time between the as-left and as-found set pressure test of each SRV, the set pressure drift was then linearly extrapolated to determine whether the SRV set pressure would still be within the required ± 3.0 percent tolerance following a 48-month period. The setpoint drift performance of the QCNPS, Units 1 and 2, SRVs has steadily improved due to this enhanced maintenance program. The licensee's assessment concluded that there is reasonable assurance that each SRV will retain the set pressure within the required drift tolerances after extending the test sampling interval to a proposed 48-month interval.

Since 2014, 10 QCNPS, Units 1 and 2, valves have been removed and as-found tested, and using the linear extrapolation method, all valves were projected to have lift setpoints within the ± 3.0 percent set pressure tolerance. In its submittal, the licensee summarizes historical set pressure test performance, in years of service, predicting when each SRV would exceed the ± 3.0 percent set pressure tolerance for SRVs removed and tested since 2014. The licensee's submittal predicts a significant number of years for the setpoint performance projection.

The licensee considers that the improved valve performance can be attributed to implementation of the SRV Best Practices Maintenance Program, which requires that all valves be disassembled and inspected prior to as-left testing and installation. The licensee states that it will continue to disassemble and inspect each subject SRV following as-found set pressure testing to verify that the parts are free of defects resulting from time-related degradation or service-induced wear. The alternative request specifies that each valve shall be disassembled and inspected prior to as-left testing and installation in accordance with the SRV Best Practices Maintenance Program.

The licensee asserts that extending the test sampling interval from 24 months to 48 months (i.e., from the date of installation in the plant), while maintaining the requirement to test the valves at least once every 5 years beginning from the date of the as-left set pressure test for each valve, is acceptable based upon past performance and a mathematical evaluation which shows that the QCNPS, Units 1 and 2, Target Rock SRVs can maintain their setpoint within tolerance over a 48-month period.

The proposed alternative to the test sampling requirements will also contribute to the principle of maintaining radiation dose as low as is reasonably achievable. Using recent dose measurements associated with QCNPS, Units 1 and 2 SRV removal and replacement, the licensee reports that the average radiological exposure incurred per valve has been 0.54 roentgen equivalent man (rem). Extending the SRV test sampling interval from 24 to 48 months would allow extending the schedule of testing of the SRV on each unit from every refueling outage to every other refueling outage, potentially providing a reduction of two SRVs tested every 10 years per unit. This amounts to a potential radiological exposure savings of approximately 2 rem for QCNPS, Units 1 and 2, over a 10-year interval.

Since 2014, the licensee has been collecting, trending, and analyzing SRV test, maintenance, inspection, and performance data across the fleet. Trending and analyzing data between the stations, which have the same SRV model, reduces the effective maximum elapsed time between the same model SRV tests (i.e., in this case, Target Rock 3-Stage SRV Model 67F at Dresden Nuclear Power Station, Peach Bottom Atomic Power Station, and QCNPS, Units 1 and 2). The SRV Best Practices Maintenance Program establishes the tracking and trending guidelines for maintaining this effort. Based on the application of the SRV Best Practices Maintenance Program, the past performance of the SRVs at QCNPS, and a mathematical

evaluation of valve performance, there is reasonable assurance that each SRV will remain within the setpoint tolerance over the extended 48-month test sampling interval.

If an as-found set pressure test result failure were to occur, the licensee will document the failure in its Corrective Action Program and the requirements of ASME OM Code, appendix I, paragraph I-1320(c), would be followed. This ASME OM Code requirement states in part:

The Owner shall evaluate the cause and effect of valves that fail to comply with the set-pressure acceptance criteria. ... Based upon this evaluation, the Owner shall determine the need for testing in addition to the minimum tests...to address any generic concerns that could apply to valves in the same or other valve groups.

The licensee will take actions determined by the evaluation to address the failure. Returning the valve to a 24-month test sampling interval might be implemented based on the failure and evaluation but is not required by the alternative request.

In summary, the licensee asserts that the proposed alternative provides (1) an acceptable level of valve operational readiness, (2) an acceptable level of quality and safety in accordance with 10 CFR 50.55a(z)(1), and (3) reduced occupational radiological exposure.

Reason for Request

In accordance with 10 CFR 50.55a(z)(1), the licensee proposes an alternative to the certain requirements in ASME OM Code, Division 1, Appendix I, subparagraph I-1320(a). Specifically, the proposed alternative would change the test sampling interval, which requires a minimum of 20 percent of the valves from each valve group to be tested, for the applicable SRVs from 24 months to 48 months. The proposed alternative does not alter the requirement to test Class 1 pressure relief valves at least once every 5 years beginning from the date of the as-left set pressure test for each valve. In addition, the proposed alternative does not alter the requirement of subparagraph I-1320(b)(2) to test valves removed from service within 12 months of removal from the system. The basis of this request is that an SRV set pressure performance assessment supports the conclusion that the proposed alternative would provide an acceptable level of quality and safety.

At QCNPS, Units 1 and 2, there is a single Target Rock 3-Stage, Model 74-67F, SRV installed on each unit's Main Steam lines inside the drywell. This valve is included in an IST Program valve group that includes only this valve (i.e., a group of one on each unit). Per the requirements of ASME OM Code, Division 1, appendix I, subparagraph I-1320(a), this valve is assigned a 5-year testing interval (i.e., beginning from the date of the as-left set pressure test) and is required to be tested every outage in order to comply with the additional requirements that a minimum of 20 percent of the valves in each group are tested every 24 months. QCNPS, Units 1 and 2, are currently operating on 24-month refueling cycles. The QCNPS, Units 1 and 2, Target Rock SRVs have continued to show reliable set pressure test performance.

On November 9, 2022 (ML22311A003), the NRC authorized Alternative Request RV-08 to extend the required test sampling interval for the applicable SRVs from 24 months to 48 months from the date of the as-left set pressure test for QCNPS, Units 1 and 2. Proposed Revision 1 to Alternate Request RV-08 retains the 48-month test sampling interval that was previously authorized but alters the start date of the 48-month interval such that it begins upon installation of the valve in the plant rather than on the date of the as-left set pressure test. The revision is

necessary to provide flexibility for performing as-left testing and to accommodate the time when a valve is in storage following the set pressure test until installation in the plant. This change aligns with the original ASME OM Code requirement to test the valves at least once every 5 years from the date of the as-left set pressure test, and the licensee's plan to replace the Target Rock SRV on each unit every other refueling outage. The proposed alternative does not alter the requirement to test the valves at least once every 5 years beginning from the date of the as-left set pressure test for each valve.

The licensee's performance assessment of the QCNPS, Units 1 and 2, Target Rock SRVs concluded that there is reasonable assurance that each valve will retain the set pressure within the required drift tolerances after extending the test sampling interval from 24 months to 48 months. The licensee asserts that extending the SRV test sampling interval from 24 to 48 months will permit testing the Target Rock SRVs every other refueling outage with a corresponding reduction in occupational radiological dose incurred during the valve removal, testing, and re-installation maintenance activities.

3.2 NRC Staff Evaluation

In Revision 1 to Alternative Request RV-08, the licensee proposes that the ASME OM Code, appendix I, subparagraph I-1320(a), minimum test sampling interval for the group of one SRV at QCNPS, Units 1 and 2, be extended from 24 months to 48 months for each valve. On November 9, 2022, the NRC authorized Alternative Request RV-08 that extended the required test sampling interval for the applicable SRVs at QCNPS, Units 1 and 2, from 24 months to 48 months from the date of the as-left set pressure test. Proposed Revision 1 to RV-08 retains the 48-month test sampling interval that was previously authorized but proposes the start date of the 48-month interval to be the installation of the SRV in the plant rather than the date of the as-left set pressure test. The proposed alternative does not alter the requirement in ASME OM Code, appendix I, subparagraph I-1320(a), to test Class 1 pressure relief valves at least once every 5 years beginning from the date of the as-left set pressure test for each valve. In addition, the proposed alternative does not alter the requirement of subparagraph I-1320(b)(2) to test valves removed from service within 12 months of removal from the system.

In support of its request, the licensee states that its fleet-wide SRV Best Practices Maintenance Program, which began in 2010, has resulted in improved SRV setpoint drift performance. Major program elements include specific performance and inspection criteria and maintenance steps that exceed OEM specifications and/or industry-established guidelines. In its alternative request, the licensee summarized the main program elements, including (1) spring testing, (2) lapping techniques and tools, (3) set pressure adjustment methodology precision, (4) ADT trending, and (5) internal component condition variations. The licensee reports that these elements have supported improved setpoint retention of the SRVs at QCNPS, Units 1 and 2. The licensee's submittal shows successful performance of the SRV Best Practices Maintenance Program.

As described in its submittal, the licensee performed a performance assessment of the Target Rock SRVs at QCNPS, Units 1 and 2. This assessment reviewed as-left/as-found set pressure data since 1998 and identified (1) whether the valves' set pressure drifted up or down, and (2) the absolute set pressure changes between tests. Based on the time between the as-left and as-found set pressure test of each SRV, the licensee extrapolated the set pressure drift to determine that the SRV set pressure would be within the required ± 3.0 percent tolerance following a 48-month period. Since 2014, the licensee has removed and as-found tested 10 QCNPS, Units 1 and 2 SRVs, with all valves projected to have lift setpoints within the ± 3.0 percent set pressure tolerance. In its submittal, the licensee summarizes historical set

pressure test performance, in years of service, predicting when each SRV would exceed the ± 3.0 percent set pressure tolerance for SRVs removed and tested since 2014. The licensee's submittal indicates a significant number of years for the setpoint performance projection.

The alternative request specifies that each valve shall be disassembled and inspected prior to as-left testing and installation in accordance with the SRV Best Practices Maintenance Program. If an as-found set pressure test result failure occurs, the licensee will document the failure in its Corrective Action Program and the requirements of ASME OM Code, appendix I, paragraph I-1320(c), will be followed. The NRC staff considers this provision of the alternative request to be appropriate.

In its supplemental letter dated December 3, 2024, the licensee discussed its plans for controlling the time period (i.e., when a valve is in storage) between the arrival of the SRV on site from the testing facility and its installation in the plant to meet the ASME OM Code requirement that the test interval for any installed valve shall not exceed 5 years. In particular, the licensee stated that the time period of each Target Rock SRV is controlled through reviews of the paperwork provided by the vendor to ensure the ASME OM Code intervals are met. A preventive maintenance (PM) activity is performed annually to ensure certification dates of valves in storage are acceptable and that valves will not exceed the 5-year test interval requirement. PM activities are also performed annually to verify valves were tested within the required timeframe and documents the installation date and how long they are installed before being removed.

Based on its review, the NRC staff finds that the licensee's SRV Best Practices Maintenance Program with sharing of applicable SRV test data between the licensee's nuclear power plants has resulted in successful SRV as-left and as-found set pressure testing to provide confidence in the operational readiness of the SRVs at QCNPS, Units 1 and 2. Further, the staff has determined that the proposal in Revision 1 to Alternative Request RV-08 to extend the required test interval for the SRVs listed in Table 1 of this safety evaluation (SE) from 24 months to 48 months from installation in the plant, combined with (1) the licensee's SRV Best Practices Maintenance Program, (2) the requirement in ASME OM Code, appendix I, subparagraph I-1320(a), to test Class 1 pressure relief valves at least once every 5 years beginning from the date of the as-left set pressure test for each valve, and (3) the requirement of ASME OM Code, subparagraph I-1320(b)(2), to test valves removed from service within 12 months of removal from the system, provides an acceptable level of quality and safety in accordance with 10 CFR 50.55a(z)(1) for the Sixth Interval IST Program at QCNPS, Units 1 and 2.

4.0 CONCLUSION

As described above, the NRC staff finds that the licensee's proposal described in Revision 1 to Alternative Request RV-08 to extend the required test interval for the SRVs listed in Table 1 of this SE from 24 months to 48 months from installation in the plant, combined with (1) the licensee's SRV Best Practices Maintenance Program, (2) the ASME OM Code requirement to test Class 1 pressure relief valves at least once every 5 years beginning from the date of the as-left set pressure test for each valve, and (3) the ASME OM Code requirement to test valves removed from service within 12 months of removal from the system, will provide an acceptable level of quality and safety. Accordingly, the NRC staff concludes that the licensee has adequately addressed the regulatory requirements set forth in 10 CFR 50.55a(z)(1) for Revision 1 to Alternative Request RV-08. Therefore, the NRC staff authorizes the use of Revision 1 to Alternative Request RV-08 for the applicable SRVs within the scope of the request for the sixth interval IST program at QCNPS, Units 1 and 2, which began on August 18, 2023.

All other ASME OM Code requirements as incorporated by reference in 10 CFR 50.55a for which relief or an alternative was not specifically requested, and granted or authorized (as appropriate), in the subject request remain applicable.

Principal Contributors: Thomas Scarbrough, NRR
Nicholas Hansing, NRR

Dated: January 30, 2025

SUBJECT: QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2 – ALTERNATIVE
REQUEST RV-08, REVISION 1, SIXTH INTERVAL INSERVICE TESTING
PROGRAM (EPID L-2024-LLR-0060) DATED JANUARY 30, 2025

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