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

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

Dresden Nuclear Power Station, Units 2 and 3
Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Quad Cities Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

Subject: Response to Request for Additional Information Regarding Risk Informed
Inservice Inspection Program

- References:
- (1) Letter from AmerGen Energy Company, LLC to U.S. NRC, "Alternative to the ASME Boiler and Pressure Vessel Code Section XI Requirements for Class 1 and Class 2 Piping Welds Risk Informed Inservice Inspection Program," dated October 15, 2001
 - (2) Letter from Commonwealth Edison Company to U.S. NRC, "Alternative to the ASME Boiler and Pressure Vessel Code Section XI Requirements for Class 1 and Class 2 Piping Welds Risk Informed Inservice Inspection Program," dated October 18, 2000
 - (3) Letter from Exelon Generation Company, LLC to U.S. NRC, "Alternative to the ASME Boiler and Pressure Vessel Code Section XI Requirements for Class 1 and Class 2 Piping Welds Risk Informed Inservice Inspection Program," dated May 18, 2001
 - (4) Letter from Commonwealth Edison Company to U.S. NRC, "Risk Informed Inservice Inspection Program Alternative to the ASME Boiler and Pressure Vessel Code Section XI Requirements for Class 1 and Class 2 Piping Welds," dated November 30, 2000

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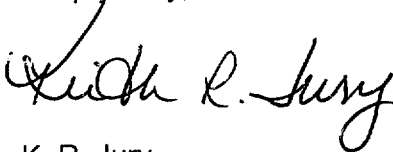
In the above referenced letters, Exelon Generation Company (EGC), LLC, AmerGen Energy Company, LLC, and Commonwealth Edison Company, now EGC, requested approval of an alternative to the existing edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," requirements for the selection and examination of Class 1 and 2 piping welds. This alternative utilizes the risk-informed inservice inspection (RI-ISI) program methodology discussed in Electric Power Research Institute (EPRI) Topical Report 112657, "Revised Risk-Informed Inservice Inspection Evaluation Procedure," Revision B-A, December 1999.

In Section 4.0, "Implementation and Monitoring Program," of the referenced letters, we stated that, as a minimum, the risk ranking of piping segments and element selections will be reviewed and adjusted on an ASME ISI "Interval" basis. During a November 1, 2001, teleconference call between members of the NRC and EGC, it was agreed that the risk ranking of piping segments will be reviewed and adjusted on an ASME ISI "Period" basis. This review will be documented internally, and the results need not be submitted to the NRC on the "Period" frequency. We also understand that the RI-ISI program is a living program and its implementation will require feedback of new, relevant information to ensure the appropriate identification of safety significant piping locations. More frequent adjustment of the piping segment risk ranking may also be necessary based on future NRC bulletins or generic letters, or by industry/plant-specific feedback.

The RI-ISI program will be updated and submitted to the NRC at the end of the 10-year ISI interval. This submittal may again take the form of a relief request to implement an updated RI-ISI program depending on future regulatory requirements. The RI-ISI program may be submitted to the NRC prior to the end of the 10-year ISI interval if there is a deviation from the RI-ISI methodology described in the initial 10-year interval ISI submittal for that interval, or if industry experience determines that there is a need for significant revision to the program as described in the initial 10-year interval ISI submittal.

Please direct any questions you may have regarding this submittal to Mr. J. A. Bauer at (630) 657-2801.

Respectfully,



K. R. Jury
Director – Licensing
Mid-west Regional Operating Group

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