

Proprietary Information – Withhold From Public Disclosure Under 10 CFR 2.390

RS-13-046

10 CFR 50.55a

February 13, 2013

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

Quad Cities Nuclear Power Station, Unit 2
Renewed Facility Operating License No. DPR-30
NRC Docket No. 50-265

Subject: Relief Request I5R-11 Associated with Reactor Pressure Vessel Penetration
N-11B Repair

- References:**
1. Letter from P. R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Relief Request I4R-19 Associated with the Reactor Pressure Vessel Nozzle Repairs," dated April 6, 2012
 2. Letter from J. Wiebe (U.S. NRC) to M. J. Pacilio (Exelon Generation Company, LLC), "Quad Cities Nuclear Power Station, Unit 2 – Safety Evaluation in Support of Request for Relief Associated with the Reactor Pressure Vessel Nozzle Repairs (TAC No. ME8347)," dated January 30, 2013

During the Spring 2012 refueling outage for Quad Cities Nuclear Power Station (QCNPS) Unit 2, reactor pressure vessel instrument penetration N-11B was found to have approximately 60 drops per minute of leakage. In Reference 1, Exelon Generation Company, LLC (EGC) requested NRC approval of relief request I4R-19 associated with the repair of penetration N-11B. The repair plan involved installing a welded pad using Ambient Temperature Temper Bead (ATTB) welding in accordance with American Society of Mechanical Engineers (ASME) Code Case N-638-4, "Similar and Dissimilar Metal Welding Using Ambient Temperature Machine GTAW Temper Bead Technique, Section XI, Division I." The repair created a new pressure boundary on the outer diameter of the reactor pressure vessel, as opposed to the original pressure boundary on the inner diameter of the reactor pressure vessel. Under relief request I4R-19, EGC repaired the leaking penetration without removing, sizing, or otherwise handling the presumed flawed volume of the penetration. A flaw evaluation was provided to justify the repair.

Attachment 2 Contains Proprietary Information. Withhold From Public Disclosure Under 10 CFR 2.390. When separated from Attachment 2, this document is decontrolled.

On April 15, 2012, the NRC verbally authorized EGC to implement the proposed alternative documented in relief request I4R-19, because the alternative represented an acceptable level of quality and safety in accordance with 10 CFR 50.55a, "Codes and standards," paragraph (a)(3)(i). The NRC issued the written safety evaluation associated with relief request I4R-19 in Reference 2, which authorized the alternative described in relief request I4R-19 until the next refueling outage. Reference 2 also notes that relief from the requirements for subsequent examinations of flaws in accordance with IWB-2420(b) and (c) was not authorized because any subsequent examination would occur beyond this timeframe.

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (a)(3)(i), EGC hereby requests NRC approval of the attached relief request I5R-11 for QCNPS Unit 2. EGC has determined that the proposed alternative provides an acceptable level of quality and safety as required by 10 CFR 50.55a(a)(3)(i). As discussed above, the authorization for relief request I4R-19 remains in effect only until the next refueling outage. Proposed relief request I5R-11, provided in Attachment 1, seeks permanent relief for the penetration N-11B repair, including the subsequent examination requirements. The proposed relief request is supported by a flaw evaluation provided in Attachment 2.

The fifth 10-year Inservice Inspection Program interval for QCNPS is currently scheduled to begin on April 2, 2013. Therefore, relief request I5R-11 is based on the code of record for the fifth interval, which is the ASME Boiler and Pressure Vessel Code (Code), Section XI, 2007 Edition through 2008 Addenda.

The information in Attachment 2 is proprietary to AREVA NP Inc., and is supported by an affidavit signed by AREVA NP Inc. The affidavit, provided in Attachment 3, sets forth the basis on which the information may be withheld from public disclosure by the NRC and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR 2.390, "Public inspections, exemptions, requests for withholding." Accordingly, it is requested that the information be withheld from public disclosure in accordance with 10 CFR 2.390. A non-proprietary version of Attachment 2 is not being submitted since it would be of no value due to the extent of proprietary information in the documents.

EGC requests approval of the proposed alternative (i.e., attached relief request I5R-11) by February 13, 2014, in order to support continued operation after the next Unit 2 refueling outage, which is currently scheduled to begin in April 2014.

There are no regulatory commitments contained in this letter. Should you have any questions concerning this letter, please contact Mr. Kenneth M. Nicely at (630) 657-2803.

Respectfully,



Patrick R. Simpson
Manager – Licensing

Attachments:

1. 10 CFR 50.55a Relief Request ISR-11, Revision 0
2. AREVA NP Inc. Document No. 32-9193800-00, "Quad Cities Unit 2 Instrument Nozzle J-Groove Weld Flaw Evaluation using Finite Element" (PROPRIETARY INFORMATION)
3. AREVA NP Inc. Affidavit

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