

January 12, 2023

10 CFR 50.55a

RS-23-003

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

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

Subject: Response to Request for Additional Information for Alternative I6R-09 to Permit Continued Application of Certain ASME Section XI 2013 Edition Non-Destructive Examination Requirements

- References:
1. Letter from P.R. Simpson (Constellation Energy Generation, LLC (CEG)) to U.S. NRC, "Submittal of Sixth Inservice Inspection Interval Relief Request I6R-09 to Permit Continued Application of Certain ASME Section XI 2013 Edition Non-Destructive Examination Requirements, " dated July 25, 2022 (ADAMS Accession No. ML22206A143)
 2. Email from R. Kuntz (U.S. NRC) to R.L. Steinman (CEG), Subject: DRAFT Request for Additional Information RE: Quad Cities Alternative I6R-09 (EPID L-2022-LLR-0059), dated December 14, 2022 (ADAMS Accession No. ML22348A045)

In Reference 1, Constellation Energy Generation, LLC (CEG) submitted relief requests associated with the Sixth 10-Year Inservice Inspection (ISI) Program Interval for Quad Cities Nuclear Power Station (QCNPS), Units 1 and 2. The Sixth Interval ISI Program will comply with the 2017 Edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code. However, alternative I6R-09 seeks short-term application of certain 2013 Edition non-destructive examination requirements to maintain QCNPS requirements consistent with the remainder of the CEG fleet.

As documented in Reference 2, the NRC found that additional information was required to support its review of Reference 1. The requested information is provided in the attachment.

There are no regulatory commitments included in this letter. CEG continues to seek approval of Reference 1 by March 31, 2023.

Should you have any questions concerning this letter, please contact Ms. Rebecca L. Steinman at 630-657-2831.

Respectfully,

A handwritten signature in black ink, appearing to read "Patrick R. Simpson", with a long horizontal flourish extending to the right.

Patrick R. Simpson
Sr. Manager – Licensing
Constellation Energy Generation, LLC

Attachment: Response to NRC Request for Information

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

ATTACHMENT

Response to NRC Request for Additional Information

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

RAI 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.

Constellation Energy Generation, LLC (CEG) Response to RAI 1

The proposed alternative, I6R-09, does not impact the duration of the 5th or 6th intervals. The Quad Cities Nuclear Power Station (QCNPS) 5th In-Service Inspection Interval began on April 13, 2013 and is currently scheduled to end on April 1, 2023. The upcoming 6th In-Service Inspection Interval is currently scheduled to begin on April 2, 2023 and end on April 1, 2033.

RAI 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.

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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.

CEG Response to RAI 2

- a. Refer to Table RAI-3.1 for a summary of the American Society of Mechanical Engineers (ASME) Section XI non-destructive examination (NDE) requirements related to Mandatory Appendices that will continue to use the requirements of the 2013 Edition of ASME Section XI. Table RAI-3.2 provides a detailed analysis of each change.
- b. Appendix XI of 2017 will be available for use during the 6th In-Service Inspection Interval, refer to Note 1 under Table RAI-3.1.
- c. Refer to Table RAI-3.2 for a detailed summary of NDE requirements for the 2017 Edition compared to the 2013 Edition, as well as an analysis of each.

RAI 3

Discuss whether any of the prior relief and alternative requests approved by NRC will be affected by this alternative request.

CEG Response to RAI 3

The proposed alternative does not affect any previous submitted relief request for the QCNPS 6th In-Service Inspection Interval.

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Table RAI-3.1 - Proposed ASME Section XI Codes¹

Code Provision		ASME Section XI Edition/Addenda ²
Sub-Section	Article	2013 Edition
IWA-General Requirements	IWA-1000	X ³
	IWA-2000	X ⁴
IWE-Requirements for Class MC Components	IWE-2300	X ⁵
Mandatory Appendices	I	X
	III	X
	IV	X
	VI	X
	VII	X ⁶
	VIII	Note 7

Notes:

1. Constellation will use the Articles and Mandatory Appendices of the 2013 Edition as shown in this table for NDE related activities. Articles, Mandatory Appendices (including Appendix XI, Repair Replacement Activities for Class 3 Polyethylene Piping), and Nonmandatory Appendices not identified in the table will use the 2017 Edition.
2. Constellation will comply with all NRC conditions, limitations, and restrictions specified in 10 CFR 50.55a(b)(2) for the applicable Edition referenced.
3. Constellation will use the referenced standards from the 2013 Edition in IWA-1600 in relation to NDE related activities. All other paragraphs will utilize the 2017 Edition.
4. Constellation will use IWA-2100, General, IWA-2200, Qualification Methods, and IWA-2300, Qualification of Nondestructive Examination Personnel, from the 2013 Edition. However, Constellation will use IWA-2400, IWA-2500, and IWA-2600 from the 2017 Edition.
5. Constellation will use IWE-2300 from the 2013 Edition for requirements applicable to examination methods and qualification of personnel.
6. Appendix VII will be implemented from the 2013 Edition as amended by 10 CFR 50.55a(b)(2)(xviii)(D) to use Table VII-4110-1 and VIII-2200 from the 2010 Edition.
7. As required by 10 CFR 50.55a, Constellation implements the latest approved Edition of Appendix VIII.

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Table RAI-3.2 - Detailed Analysis of Changes

Paragraph	2013 Edition	2017 Edition	Description of Change	Comments
Table IWA-1600-1	REFERENCED STANDARDS AND SPECIFICATIONS	REFERENCED STANDARDS AND SPECIFICATIONS	Table revised in its entirety.	This change has no effect
IWA-2100	GENERAL	GENERAL	No change.	No change from 2013 to 2017 edition.
IWA-2200	EXAMINATION METHODS (c) ...Nonmandatory Appendix S provides guidance that may be used for evaluating examination coverage.	EXAMINATION METHODS (c) ...Nonmandatory Appendix S provides guidance that may be used for calculating examination coverage.	Subparagraph (c) revised as shown.	This change has no effect.
IWA-2210	VISUAL EXAMINATION (2013 Edition) Visual examination shall be conducted in accordance with the requirements of Section V, Article 9, except that the illumination shall be in accordance with IWA-2211 and the demonstration shall be in accordance with Table IWA-2211-1.	VISUAL EXAMINATION Visual examination shall be conducted in accordance with the requirements of Section V, Article 9, except that the angle of view requirements for direct visual only apply to VT-1, and the requirements for illumination, distance, and resolution demonstration shall be in accordance with Table IWA-2211-1.	Subarticle revised as shown.	This change is less restrictive.
IWA-2211	VT-1 Examination (e) ...same portable nonbattery powered light source...	VT-1 Examination (e) ...same portable non-battery-powered light source...	Subparagraph (e) corrected by errata.	This change is editorial.
IWA-2212	n/a	VT-2 Examination (c) As indicated in Table IWA-2211-1, there are no illumination, distance, and resolution demonstration requirements for VT-2.	Subparagraph (c) added.	This change is less restrictive.
IWA-2213	VT-3 Examination (e) ...same portable nonbattery powered light source...	VT-3 Examination (e) ...same portable non-battery powered light source...	Subparagraph (e) corrected by errata.	This change is editorial.
Table IWA-2211-1	VISUAL EXAMINATIONS	VISUAL EXAMINATIONS	VT-2 added to table.	This change is less restrictive

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Table RAI-3.2 - Detailed Analysis of Changes

Paragraph	2013 Edition	2017 Edition	Description of Change	Comments
Table IWA-2211-1	VISUAL EXAMINATIONS	VISUAL EXAMINATIONS	"(lx)" corrected to "(lux)" by errata in second column.	This change is editorial.
IWA-2221	Magnetic Particle Examination (c) ...visible light intensity required is 50 fc...	Magnetic Particle Examination (c) ...visible light intensity required is 50 fc (550 lux)...	Subparagraph (c) corrected by errata.	This change is editorial.
IWA-2222	Liquid Penetrant Examination (b) ...visible light intensity required is 50 fc...	Liquid Penetrant Examination (b) ...visible light intensity required is 50 fc (550 lux)...	Subparagraph (b) corrected by errata.	This change is editorial.
IWA-2232	Ultrasonic Examination Ultrasonic examination shall be conducted in accordance with Appendix I.	Ultrasonic Examination Ultrasonic examination shall be conducted in accordance with Mandatory Appendix I except for steam generator tubing examinations.	Paragraph revised as shown.	This change is less restrictive.
IWA-2234	Acoustic Emission Examination ...The flaws shall be sized by ultrasonic examination in accordance with Appendix I, Supplement 12, prior...	Acoustic Emission Examination ...The flaws shall be sized by ultrasonic examination in accordance with Mandatory Appendix I prior...	Paragraph corrected by errata as shown.	This change has no effect.

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Table RAI-3.2 - Detailed Analysis of Changes

Paragraph	2013 Edition	2017 Edition	Description of Change	Comments
IWA-2310	GENERAL (a) Personnel performing nondestructive examinations (NDE) shall be qualified and certified using a written practice prepared in accordance with ANSI/ASNT CP 189, Standard for Qualification and Certification of Nondestructive Testing Personnel, as amended by the requirements of this Division. Certifications based on SNT-TC-1A, ANSI N45.2.6, or earlier editions of ANSI/ASNT CP-189 are valid...	GENERAL (a) Personnel performing nondestructive examinations (NDE) shall be qualified and certified using a written practice prepared in accordance with ANSI/ASNT CP-189, Standard for Qualification and Certification of Nondestructive Testing Personnel, and ANSI/ASNT CP-105, Standard for Topical Outlines for Qualification of Nondestructive Testing Personnel, as amended by the requirements of this Division. Certifications based on earlier editions of ANSI/ASNT CP-189 are valid...	Subparagraph (a) revised as shown.	The proposed alternative to continue to implement the 2013 Edition, including all applicable 10 CFR 50.55a(b)(2) conditions, for the first inspection period will ensure an acceptable level of quality and safety.
IWA-2310	GENERAL (a) ...responsible for the certification of Levels I, II, and III personnel...	GENERAL (a) ...responsible for the certification of Level I, II, and III personnel...	Subparagraph (a) corrected by errata.	This change is editorial.
IWA-2312	NDE Methods Listed in ANSI/ASNT CP-189 (c) Training, qualification, and certification of visual examination personnel shall comply with the requirements of Appendix VI.	NDE Methods Listed in ANSI/ASNT CP-189 (c) Training, qualification, and certification of visual examination personnel shall also comply with the requirements of Mandatory Appendix VI. (d) Training, qualification, and certification of steam generator tubing examination personnel shall include the requirements of IWA-2315.	(1) Subparagraph (c) revised as shown. (2) New subparagraph (d) added and remaining subparagraphs redesignated.	The proposed alternative to continue to implement the 2013 Edition, including all applicable 10 CFR 50.55a(b)(2) conditions, for the first inspection period will ensure an acceptable level of quality and safety.

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Table RAI-3.2 - Detailed Analysis of Changes

Paragraph	2013 Edition	2017 Edition	Description of Change	Comments
IWA-2314	Certification and Recertification (2013 Edition) (a) ...Level I, II, and III personnel... (d) Level I, II, and III NDE personnel...	Certification and Recertification (2015 Edition) (a) ...Levels I, II, and III personnel... (d) Levels I, II, and III NDE personnel...	Subparagraphs (a) and (d) revised as shown.	This change is editorial.
IWA-2314	Certification and Recertification (2015 Edition) (a) ...Levels I, II, and III personnel... (c) ...requirements for Levels I and II NDE personnel. (d) Levels I, II, and III NDE personnel...	Certification and Recertification (a) ...Level I, II, and III personnel... (c) ...requirements for Level I and II NDE personnel. (d) Level I, II, and III NDE personnel...	Subparagraphs (a), (c), and (d) corrected by errata.	This change is editorial.
IWA-2315	Personnel Requirements for Eddy Current Examination of Steam Generator Tubing Personnel performing analysis or evaluation of data shall be qualified by examination to perform analysis of multifrequency data and to use multiparameter signal combination techniques. The qualification shall include a practical examination that includes techniques used and the types of flaws that may be found during examination of steam generator tubing.	Personnel Requirements for Examination of Steam Generator Tubing Personnel performing analysis or NDE evaluation of the data shall be qualified. The qualification shall include a practical examination that includes techniques used and the types of flaws that may be found during examination of steam generator tubing.	Paragraph revised as shown.	This change is less restrictive.

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Table RAI-3.2 - Detailed Analysis of Changes

Paragraph	2013 Edition	2017 Edition	Description of Change	Comments
IWA-2318	n/a	Qualification for Pneumatic Pressure Test Personnel	New paragraph IWA-2318 added.	The proposed alternative to continue to implement the 2013 Edition, including all applicable 10 CFR 50.55a(b)(2) conditions, for the first inspection period will ensure an acceptable level of quality and safety.
IWA-2324	n/a	Practical Examination Techniques for CP-189	New paragraph IWA-2324 added.	The proposed alternative to continue to implement the 2013 Edition, including all applicable 10 CFR 50.55a(b)(2) conditions, for the first inspection period will ensure an acceptable level of quality and safety.
Table IWA-2324-1	n/a	Practical Examination NDE Techniques	New Table IWA-2324-1 added.	The proposed alternative to continue to implement the 2013 Edition, including all applicable 10 CFR 50.55a(b)(2) conditions, for the first inspection period will ensure an acceptable level of quality and safety.

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Table RAI-3.2 - Detailed Analysis of Changes

Paragraph	2013 Edition	2017 Edition	Description of Change	Comments
IWA-2330	LEVEL I RESPONSIBILITIES ...Level I personnel shall not evaluate or accept the results of a nondestructive examination.	LEVEL I RESPONSIBILITIES ...Level I personnel shall not perform an NDE evaluation or accept the results of a nondestructive examination.	Paragraph revised as shown.	This change has no effect.
IWA-2350	LIMITED CERTIFICATION Limited certification in a method is permitted for personnel who are restricted to performing examinations of limited scope, i.e., limited operations or limited techniques within the method. Topics that are not relevant to the limited certification may be deleted from the ANSI/ASNT CP-189, Appendix VI, or Appendix VII training outline and may be accompanied...	LIMITED CERTIFICATION Limited certification provisions of ANSI/ASNT CP-189 do not apply. Limited certification in a method is permitted for personnel who are restricted to performing examinations of limited scope, i.e., limited operations or limited techniques within the method. Topics that are not relevant to the limited certification may be deleted from the applicable training outline and may be accompanied...	Paragraph revised as shown.	This change has no effect.
IWA-2360	LEVEL I AND LEVEL II TRAINING AND EXPERIENCE n/a	LEVEL I AND LEVEL II TRAINING AND EXPERIENCE (c) Experience is work time in an NDE method. Classroom and laboratory training time shall not be credited as experience.	Subparagraph (c) added.	The proposed alternative to continue to implement the 2013 Edition, including all applicable 10 CFR 50.55a(b)(2) conditions, for the first inspection period will ensure an acceptable level of quality and safety.
IWE-2300	Examination and Inspection	Examination and Inspection	No change impacting NDE requirements.	This change has no effect.

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Table RAI-3.2 - Detailed Analysis of Changes

Paragraph	2013 Edition	2017 Edition	Description of Change	Comments
Appendix I I-3200	PIPING (c) Dissimilar metal welds shall be examined in two axial and two circumferential directions. Procedures and personnel qualified solely from the austenitic side of the weld may be used to perform examinations from either side of the weld. When examination from both sides is not possible, procedures and personnel qualified for singleside examination in accordance with Appendix VIII, Supplement 10, with all flaws on the opposite side of the weld, shall be used to examine the required volume.	PIPING (c) Dissimilar metal welds shall be examined in two axial and two circumferential directions. If examination from both sides of the weld is not possible, procedures and personnel qualified for singleside examination in accordance with Mandatory Appendix VIII, Supplement 10, shall be used	Subparagraph revised as shown.	This change is less restrictive.
Appendix I Supplement 11	GEOMETRIC INDICATIONS (a) ...and flaw sizing in accordance with Supplement 12 and comparison...	GEOMETRIC INDICATIONS (a) ...and flaw sizing and comparison...	Text "in accordance with Supplement 12" removed by errata.	This change has no effect.
Appendix III III-1100	GENERAL (b) The requirements of Supplement 1 apply to examination of austenitic and dissimilar metal welds.	GENERAL (b) The requirements of Supplement 1 apply to examination of welds in wrought austenitic materials and dissimilar metal welds from the outside surface. The requirements of Supplement 2 apply to welds in centrifugally and statically cast austenitic materials examined from the outside surface.	Subparagraph (b) revised as shown.	The proposed alternative to continue to implement the 2013 Edition, including all applicable 10 CFR 50.55a(b)(2) conditions, for the first inspection period will ensure an acceptable level of quality and safety.

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Table RAI-3.2 - Detailed Analysis of Changes

Paragraph	2013 Edition	2017 Edition	Description of Change	Comments
Appendix III Supplement 1	AUSTENITIC AND DISSIMILAR METAL WELDS.	AUSTENITIC AND DISSIMILAR METAL WELDS	Supplement 1 revised in its entirety to remove cast materials.	The proposed alternative to continue to implement the 2013 Edition, including all applicable 10 CFR 50.55a(b)(2) conditions, for the first inspection period will ensure an acceptable level of quality and safety.
Appendix III Supplement 2	n/a	WELDS IN CAST AUSTENITIC MATERIALS	Supplement 2 added to address welds in cast austenitic materials.	The proposed alternative to continue to implement the 2013 Edition, including all applicable 10 CFR 50.55a(b)(2) conditions, for the first inspection period will ensure an acceptable level of quality and safety.
Appendix IV IV-2200	PROCEDURE SPECIFICATIONS (b)(3) extent or area of the component evaluated	PROCEDURE SPECIFICATIONS (b)(3) extent or area of the component examined	Subparagraph (b)(3) revised as shown.	This change has no effect.
Appendix IV Table IV-3110-1	Table IV-3110-1	Table IV-3110-1	Added Component Type "Piping (Inside Surface)" and Applicable Supplement "4" to the table.	The proposed alternative to continue to implement the 2013 Edition, including all applicable 10 CFR 50.55a(b)(2) conditions, for the first inspection period will ensure an acceptable level of quality and safety.

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Table RAI-3.2 - Detailed Analysis of Changes

Paragraph	2013 Edition	2017 Edition	Description of Change	Comments
Appendix IV Supplement 2	1.0 SPECIMEN REQUIREMENTS (d)(2) The length of cracks or notches open to the surface shall not exceed the allowable length specified in IWB-3514 and IWC-3514 for inservice surface flaws for piping or Table IWB-3510-3 and Table IWC-3510-3 for vessels.	1.0 SPECIMEN REQUIREMENTS (2015 Edition) (d)(2) The length of cracks or notches open to the surface shall be either (a) 1/16 in. (1.5 mm) or less, or (b) less than or equal to the allowable length specified in IWB-3514 and IWC-3514 for inservice surface flaws for piping or Tables IWB-3510-3 and IWC-3510-3 for vessels	Subparagraph (d)(2) revised as shown.	This change is less restrictive.
Appendix IV Supplement 2	1.0 SPECIMEN REQUIREMENTS (2015 Edition) (d)(2) The length of cracks or notches open to the surface shall be either (a) 1/16 in. (1.5 mm) or less, or (b) less than or equal to the allowable length specified in IWB-3514 and IWC-3514 for inservice surface flaws for piping or Tables IWB-3510-3 and IWC-3510-3 for vessels	1.0 SPECIMEN REQUIREMENTS (d)(2) The length of cracks or notches open to the surface shall (-a) not exceed 1/16 in. (1.5 mm) for any austenitic stainless steels, or nickel alloys UNS N06600, N06082, W86182, W86152, and N06054. (-b) for ferritic material be less than or equal to the allowable length specified in IWB-3514 and IWC-3514 for inservice surface flaws for piping or Tables IWB-3510-3 and IWC-3510-3 for vessels.	Subparagraphs (d)(2), (d)(2) (-a), and (d)(2) (-b) revised as shown.	The proposed alternative to continue to implement the 2013 Edition, including all applicable 10 CFR 50.55a(b)(2) conditions, for the first inspection period will ensure an acceptable level of quality and safety.
Appendix IV Supplement 3	1.0 SPECIMEN REQUIREMENTS (b) The effect of the presence of corrosion products must be evaluated if the bore hole of the bolt or stud is not thoroughly cleaned prior to examination [IV-3120(b)].	1.0 SPECIMEN REQUIREMENTS (b) The effect of the presence of corrosion products must be assessed if the bore hole of the bolt or stud is not thoroughly cleaned prior to examination [IV-3120(b)].	Subparagraph (b) revised as shown.	This change is editorial.

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Table RAI-3.2 - Detailed Analysis of Changes

Paragraph	2013 Edition	2017 Edition	Description of Change	Comments
Appendix IV Supplement 4	n/a	QUALIFICATION REQUIREMENTS FOR COMPLEMENTARY EDDY CURRENT EXAMINATION OF INSIDE SURFACES OF PIPING	New Supplement 4 added.	The proposed alternative to continue to implement the 2013 Edition, including all applicable 10 CFR 50.55a(b)(2) conditions, for the first inspection period will ensure an acceptable level of quality and safety.
Appendix VI	Mandatory Appendix VI Qualification of Personnel for Visual Examination	Mandatory Appendix VI Qualification of Personnel for Visual Examination	No change impacting NDE requirements.	This change has no effect.
Appendix VII VII-1000	INTRODUCTION AND SCOPE This Appendix specifies requirements for the training and qualification of ultrasonic nondestructive examination (NDE) personnel in preparation for Employer certification to perform NDE. Personnel shall be qualified in accordance with IWA-2300 as modified by this Appendix.	INTRODUCTION AND SCOPE This Appendix specifies requirements for the training and qualification of ultrasonic nondestructive examination (NDE) personnel in preparation for Employer certification to perform NDE. Personnel shall be qualified in accordance with IWA-2300 as modified by this Appendix. The requirements of this Appendix do not apply to personnel performing examination of steam generator tubing.	Article revised as shown.	The proposed alternative to continue to implement the 2013 Edition, including all applicable 10 CFR 50.55a(b)(2) conditions, for the first inspection period will ensure an acceptable level of quality and safety.

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Table RAI-3.2 - Detailed Analysis of Changes

Paragraph	2013 Edition	2017 Edition	Description of Change	Comments
Appendix VII Table VII-4110-1	REQUIRED EXPERIENCE FOR INITIAL CERTIFICATION FOR ULTRASONIC EXAMINATIONS (HOURS) General Notes: (c) All or part of the Level I experience hours may be satisfied by laboratory practice hours beyond those required for training in accordance with VII-4220, provided those practice hours are dedicated to the Level I or Level II skill areas as described in CP-189.	REQUIRED EXPERIENCE FOR INITIAL CERTIFICATION FOR ULTRASONIC EXAMINATIONS (HOURS) General Notes: (c) All or part of the Level I experience hours may be satisfied by laboratory practice hours beyond those required for training in accordance with VII-4220, provided those practice hours are dedicated to the Level I and Level II skill areas as described in ANSI/ASNT CP-189.	General note (c) editorially revised.	This change is editorial.
Appendix VII VII-4323	Level I and II Practical Examinations (c)(6) evaluation in terms of the recording criteria.	Level I and II Practical Examinations (c)(6) NDE evaluation in terms of the recording criteria.	Subparagraph (c)(6) revised as shown.	This change has no effect.
Appendix VII VII-4330	LEVEL III QUALIFICATION EXAMINATIONS (a) ...cover Section XI UT examination, evaluation, and acceptance criteria. Necessary data such as graphs, tables, specifications, procedures, and Codes shall be furnished.	LEVEL III QUALIFICATION EXAMINATIONS (a) ...cover Section XI UT examination, NDE evaluation, and acceptance criteria. Necessary data such as graphs, tables, specifications, procedures, and Codes shall be furnished.	Subparagraph (a) revised as shown.	This change has no effect.
Appendix VIII	Performance Demonstration For Ultrasonic Examination Systems	Performance Demonstration For Ultrasonic Examination Systems	No change	As required by 10 CFR 50.55a, Constellation implements the latest approved Edition of Appendix VIII.