

October 19, 2000

Mr. Mike Reandeau  
Director - Licensing  
Clinton Power Station  
P.O. Box 678  
Mail Code #V920  
Clinton, IL 61727

SUBJECT: CLINTON POWER STATION - SAFETY EVALUATION OF RELIEF REQUEST  
FOR SNUBBER VISUAL EXAMINATION AND FUNCTIONAL TESTING  
(TAC NO. MA9207)

Dear Mr. Reandeau:

By letter dated June 9, 2000, you submitted a request for relief from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Section XI, 1989 Edition, Article IWF-5000, with regard to visual examination and functional testing of snubbers at Clinton Power Station (CPS). Article IWF-5000 references the first Addenda to ASME/ANSI OM-1987, Part 4 (OMa-4) for such snubber activities. In Relief Request 4201, Revision 0, the licensee proposes an alternative for use at CPS during the second ten-year inservice inspection (ISI) interval.

The Nuclear Regulatory Commission (NRC) staff has evaluated the requested relief for snubber visual examination and functional testing including the proposed alternative, and the staff finds that the alternative provides an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), the licensee's request for relief for the second ten-year interval of the CPS ISI program is authorized. Our safety evaluation is enclosed.

Sincerely,

/RA/

Anthony J. Mendiola, Chief, Section 2  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-461

Enclosure: As stated

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The Nuclear Regulatory Commission (NRC) staff has evaluated the requested relief for snubber visual examination and functional testing including the proposed alternative, and the staff finds that the alternative provides an acceptable level of quality and safety. On this basis, the staff concludes that the proposed alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(i). Our safety evaluation is enclosed.

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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The Nuclear Regulatory Commission (NRC) staff has evaluated the requested relief for snubber visual examination and functional testing including the proposed alternative, and the staff finds that the alternative provides an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), the licensee's request for relief for the second ten-year interval of the CPS ISI program is authorized. Our safety evaluation is enclosed.

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Mike Reandeu

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

AMERGEN ENERGY COMPANY, LLC,

CLINTON POWER STATION

DOCKET NO. 50-461

1.0 INTRODUCTION

The operating license for the Clinton Power Station (CPS), states that the inservice inspection (ISI) of the American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components will be performed in accordance with Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," of the ASME Boiler and Pressure Vessel Code (ASME Code) and applicable addenda as required by Title 10 of the Code of Federal Regulations (10 CFR) Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i). Section 50.55a(a)(3) states that alternatives to the requirements of paragraph (g) may be used, when authorized by the Nuclear Regulatory Commission (NRC), if: (i) the proposed alternatives would provide an acceptable level of quality and safety, or (ii) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Pursuant to 10 CFR 50.55a(g)(4), ASME Code Class 1, 2, and 3 components (including supports) will meet the requirements, except the design and access provisions and the preservice examination requirements, set forth in the ASME Code, Section XI, to the extent practical within the limitations of design, geometry, and materials of construction of the components. The regulations require that inservice examination of components and system pressure tests conducted during the first 10-year interval and subsequent intervals comply with the requirements in the latest edition and addenda of Section XI of the ASME Code incorporated by reference in 10 CFR 50.55a(b), 12 months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein. The applicable edition of Section XI of the ASME Code for the CPS second 10-year ISI interval is the 1989 Edition.

Pursuant to 10 CFR 50.55a(g)(5), if the licensee determines that conformance with an examination requirement of Section XI of the ASME Code is not practical for its facility, information will be submitted to the Commission in support of that determination and a request must be made for relief from the ASME Code requirement. After evaluation of the determination, pursuant to 10 CFR 50.55a(g)(6)(i), the Commission may grant relief and/or may impose alternative requirements that are determined to be authorized by law, will not endanger

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life, property, or the common defense and security, and are otherwise in the public interest, giving due consideration to the burden upon the licensee that could result if the requirements were imposed.

By letter of June 9, 2000, AmerGen, the licensee of CPS, requested relief from the requirements of ASME Code Section XI, 1989 Edition, Article IWF-5000, with regard to visual examination and functional testing of snubbers. Article IWF-5000 references the first Addenda to ASME/ANSI OM-1987, Part 4 (OMa-4) for such snubber activities.

## 2.0 BACKGROUND

Snubber examinations and tests at CPS were initially performed in accordance with technical specifications (TS) 3/4.7.4, "Snubbers." License Amendment 61 issued on November 22, 1991, revised TS 3/4.7.4 to allow CPS to extend snubber visual inspection intervals without reducing the confidence level provided by the then existing inspection interval. Amendment 61 was issued based on guidance contained in Generic Letter (GL) 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," dated December 11, 1990. Subsequently, License Amendment 95, issued on December 2, 1994, converted the TS to the Improved TS format, and the CPS snubber visual examination and testing requirements were relocated to Section 2.4.1 (and its applicable subsections) of the Operational Requirements Manual (ORM) of CPS.

By letter No. U-602701, dated March 14, 1997, CPS submitted its program for the second 120-month ISI interval. As part of that submittal, CPS adopted ASME Section XI, 1989 Edition, as the applicable edition. Subsection IWF-5000 of that Code edition specifies the use of the first Addenda to ASME/ANSI OM-1987, Part 4 (OMa-4). The licensee stated in the June 9, 2000, letter, that compliance with Article IWF-5000 of ASME Section XI, 1989 Edition, would require the implementation of OMa-4 and, consequently, would necessitate CPS to return the snubber visual examination and testing program to that which existed prior to the implementation of GL-90-09. The licensee, therefore, requested the use of Section 2.4.1 of the CPS ORM for the required snubber visual examination and functional testing, pursuant to 10 CFR 50.55a(a)(3)(i).

## 3.0 EVALUATION

The licensee stated in the above June 9, 2000, letter, that, in lieu of using Article IWF-5000 of ASME Section XI, the ongoing visual examination and functional testing of snubbers will continue to be performed in accordance with the ORM and CPS implementing procedures including repair/replacement activities. This examination and testing program is designed to demonstrate the functional integrity of the snubbers and is, at least, equivalent to the requirements of Article IWF-5000. The requirements set forth in ORM are based, in part, on the guidance provided in GL 90-09. The stated purpose of GL 90-09 was to provide alternative guidance for snubber visual examination schedule that maintains the same confidence level as that which existed prior to GL 90-09. Specifically, ORM Section 2.4.1b and ORM Table 4.4.1-1 are used for determining snubber visual examination intervals. Section 2.4.1c provides the acceptance criteria for snubber visual examination, whereas Sections 2.4.1e through 2.4.1i provide the snubber testing requirements. The staff found these requirements to be acceptable for the CPS snubber activities.

The licensee noted that ORM covers both ASME and non-ASME Code Class snubbers. Therefore, the licensee stated that tracking the fulfillment of both the ASME Code and ORM requirements for the Code Class snubbers creates additional administrative burden without significant benefit in snubber reliability.

As part of the program, the licensee stated in its ORM that the service life of all snubbers shall be monitored to ensure that the service life is not exceeded between surveillance inspections. This is acceptable to the staff.

The staff determined that snubber visual examinations and functional testing, conducted per the ORM and CPS plant procedures, provide an equal or greater level of quality and safety than would otherwise be performed under ASME Section XI, 1989 Edition, Article IWF-5000, which references OM-1987, Part 4 (OMa-4). It is, therefore, acceptable.

#### 4.0 CONCLUSION

Based on the information provided, the staff determines that the licensee has presented an adequate justification for the relief request from the requirements of ASME Code 1989 Edition, Section XI, Article IWF-5000 (which references the first Addenda to OM-1987, Part 4), with regard to visual examination and functional testing of CPS snubbers. The staff determines that the proposed alternative use of the CPS ORM for snubber activities would provide an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), the licensee's request for relief for the second ten-year interval of the CPS ISI program is authorized.

Principal Contributor: A. Lee

Date: October 19, 2000