



An Exelon/British Energy Company

Clinton Power Station

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10CFR50.55a(f)

U-603507
July 17, 2001

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

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

Subject: Submittal of Relief Request 2205 Related to the
Requirements of 10CFR50.55a(f), "Inservice testing requirements"

Reference: Letter from J. W. Clifford (U.S. NRC) to R. G. Lizotte (Northeast Nuclear
Energy Company), "Safety Evaluation for Relief Requests Associated with
Second 10-Year Pump and Valve Inservice Testing Program, Millstone
Nuclear Power Station, Unit No. 3 (TAC No. MA9336)," dated February 2,
2001

In accordance with 10CFR50.55a, "Codes and standards," paragraph (a)(3), AmerGen
Energy Company, LLC, (i.e., AmerGen), requests approval of proposed Relief Request 2205
for use at Clinton Power Station (CPS), Unit 1. The basis for the relief request is that the
proposed alternative provides an acceptable level of quality and safety.

Relief Request 2205 proposes relief from the requirements of American Society of
Mechanical Engineers (ASME) / American National Standards Institute (ANSI), Operation
and Maintenance of Nuclear Power Plants, OM-1987, Part 1, Paragraph 3.3, related to
periodic testing of ASME Class 2 and 3 thermal relief valves. This relief request is similar to
relief approved by the NRC for the Millstone Nuclear Power Station dated February 2, 2001
referenced above.

It is requested that this proposed relief request be approved by March 1, 2002, to allow its
use in the upcoming CPS refueling outage, currently scheduled to begin in March of 2002.

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Should you have any questions concerning this letter, please contact Mr. J. L. Peterson at (217) 937-3418.

Respectfully,


J. M. Heffley
Vice President
Clinton Power Station

JLP/blf

Attachment:

Relief Request 2205 – Class 2 and 3 Thermal Relief Valves

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Clinton Power Station

ATTACHMENT

RELIEF REQUEST 2205

ATTACHMENT

Relief Request 2205 Revision 0

COMPONENT IDENTIFICATION

Code Class: 2 and 3

Component Numbers: Class 2 and 3 Pressure Relief Devices that are used for Thermal Relief Application as defined by the Clinton Power Station Inservice Testing Program

Category: C

CODE REQUIREMENT

American Society of Mechanical Engineers (ASME) / American National Standards Institute (ANSI), Operation and Maintenance (OM) of Nuclear Power Plants, OM-1987, Part 10, paragraph. 4.3.1, Safety and Relief valves shall meet the Inservice Test requirements of Part 1 of the OM Code.

CODE REQUIREMENT FOR WHICH RELIEF IS REQUESTED

ASME / ANSI, Operation and Maintenance of Nuclear Power Plants, OM-1987, Part 1, "Requirements for Inservice Performance Testing of Nuclear Power Plant Pressure Relief Devices," Paragraph 3.3, related to periodic testing of ASME Class 2 and 3 relief valves, requires periodic testing of all pressure relief devices. No maintenance, adjustment, disassembly, or other activity which could affect "as found" set pressure or seat tightness data is permitted prior to testing.

BASIS FOR RELIEF

Thermal relief valves are potentially challenged during train or component shutdowns when the component is isolated. In the event that the component is exposed to a prolonged external heat source, or due to in-leakage of higher temperature/pressure fluid past an isolation boundary, the thermal relief valve will provide overpressure protection due to thermal expansion. Since the affected trains or components are not providing a safety function while they are isolated, the thermal relief valves have limited safety significance during this condition. While these components or trains are in service, the thermal relief safety function is to remain closed as part of the system pressure boundary. This function is periodically verified during normal operation or system flow testing. Based on the above, failure of these valves to relieve an overpressure condition has minimal safety significance.

As found bench testing of Class 2 and 3 pressure relief valves used in thermal applications presents an undue administrative burden to CPS without a commensurate gain in safety. CPS presently schedules valve tests on a sample basis per the OM-1987 Part 1 requirements. In the event of a failure a sample expansion of two additional valves, from the same group, are selected for testing. Further failures necessitate testing of all remaining valves in the group. In many cases this approach creates

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scheduling difficulties in finding appropriate "windows" of opportunity to test expanded samples without incurring additional system unavailability. CPS is also forced to revise the scope of planned system outages to include contingent valve tests due to sample expansions.

PROPOSED ALTERNATIVE PROVISIONS

As an alternative, CPS will adopt Code Case OMN-2 of the 1995 OM Code Appendix I which states, "that in lieu of the requirements specified in ASME OM Code-1995, paras. I 1.3.5(a), (b), and (c) testing for Class 2 and Class 3 pressure relief devices whose only overpressure protection function is to protect isolated components from fluid expansion caused by changes in fluid temperature shall be performed once every ten years on each device unless performance data indicates that more frequent testing is needed to assure device function. In lieu of test, the Owner may replace these devices every ten years unless performance data indicates more frequent replacement is needed to assure device function."

This request is similar to relief granted to Millstone Nuclear Power Station, Unit 3, (Reference 1), dated February 2, 2001.

APPLICABLE TIME PERIOD

This alternative is requested for the remaining duration of the second inspection period for Clinton Power Station, Unit 1.

REFERENCE:

1. Letter from J. W. Clifford (U.S. NRC) to R. G. Lizotte (Northeast Nuclear Energy Company), "Safety Evaluation for Relief Requests Associated with Second 10-Year Pump and Valve Inservice Testing Program, Millstone Nuclear Power Station, Unit No. 3 (TAC No. MA9336)," dated February 2, 2001.