

October 5, 2001

Mr. Oliver D. Kingsley, President
and Chief Nuclear Officer
Exelon Nuclear
Exelon Generation Company, LLC
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: CLINTON POWER STATION, UNIT 1 - RELIEF FROM CERTAIN INSERVICE
INSPECTION PROGRAM REQUIREMENTS (TAC MB0358)

Dear Mr. Kingsley:

By letter dated October 27, 2000, AmerGen Energy Company, LLC, submitted Relief Request 4206 from certain inservice inspection criteria pertaining to training of ultrasonic testing personnel required by the American Society of Mechanical Engineers Boiler and Pressure Vessel Code at Clinton Power Station (CPS). You proposed conducting the training in accordance with 10 CFR 50.55a(b)(2)(xiv).

The Nuclear Regulatory Commission staff has reviewed the information that you provided and determined that the proposed alternative, described in Relief Request 4206, provides an acceptable level of quality and safety, and is authorized for the second 10-year interval of the Inservice Inspection Program for CPS pursuant to 10 CFR 50.55a(a)(3)(i). 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: Relief Request

cc w/encl: See next page

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Distribution:

PUBLIC TChan
PD3/2 r/f OGC
AMendiola GHill (2)
JHopkins ACRS
THarris TBergman

ADAMS ACCESSION NO: ML012620338

*See previous concurrence

OFFICE	PM:LPD3-2	LA:LPD3-2	OGC	EMEB:SC	SC:LPD3-2
NAME	JHopkins	THarris	RHoefling*	TChan*	AMendiola
DATE	10/2/01	10/2/01	09/ 27 /01	09/ 24 /01	10/4/01

OFFICIAL RECORD COPY

Oliver D. Kingsley

Clinton Power Station, Unit 1
AmerGen Energy Company, LLC

cc:

John Skolds
Chief Operating Officer
Exelon Generation Company, LLC
1400 Opus Place, Suite 900
Downers Grove, IL 60515

R. M. Krich
Director-Licensing
Mid-West Regional Operating Group
Exelon Generation Company, LLC
1400 Opus Place, Suite 900
Downers Grove, IL 60515

William Bohlke
Senior Vice President Nuclear Services
Exelon Generation Company, LLC
1400 Opus Place, Suite 900
Downers Grove, IL 60515

Robert Helfrich
Senior Counsel, Nuclear
Mid-West Regional Operating Group
Exelon Generation Company, LLC
1400 Opus Place, Suite 900
Downers Grove, IL 60515

John Cotton
Senior Vice President - Operations
Support
Exelon Generation Company, LLC
1400 Opus Place, Suite 900
Downers Grove, IL 60515

Document Control Desk-Licensing
Exelon Generation Company, LLC
1400 Opus Place, Suite 900
Downers Grove, IL 60515

Christopher Crane
Senior Vice President - Mid-West
Regional Operating Group
Exelon Generation Company, LLC
1400 Opus Place, Suite 900
Downers Grove, IL 60515

Illinois Department of Nuclear Safety
Office of Nuclear Facility Safety
1035 Outer Park Drive
Springfield, IL 62704

Jeffrey Benjamin
Vice President - Licensing and
Regulatory Affairs
Exelon Generation Company, LLC
1400 Opus Place, Suite 900
Downers Grove, IL 60515

J. M. Heffley
Vice President
Clinton Power Station
RR 3, Box 228
Clinton, IL 61727-9351

H. Gene Stanley
Operations Vice President
Mid-West Regional Operating Group
Exelon Generation Company, LLC
1400 Opus Place, Suite 900
Downers Grove, IL 60515

M. J. Pacilio
Plant Manager
Clinton Power Station
RR 3, Box 228
Clinton, IL 61727-9351

W. S. Iliff
Regulatory Assurance Manager (Acting)
Clinton Power Station
RR 3, Box 228
Clinton, IL 61727-9351

Oliver D. Kingsley

Clinton Power Station, Unit 1
AmerGen Energy Company, LLC

cc:

Resident Inspector
U.S. Nuclear Regulatory Commission
RR#3, Box 229A
Clinton, IL 61727

R. T. Hill
Licensing Services Manager
General Electric Company
175 Curtner Avenue, M/C 481
San Jose, CA 95125

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, IL 60532-4351

Chairman of DeWitt County
c/o County Clerk's Office
DeWitt County Courthouse
Clinton, IL 61727

J. W. Blattner
Project Manager
Sargent & Lundy Engineers
55 East Monroe Street
Chicago, IL 60603

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO THE INSERVICE INSPECTION PROGRAM

AMERGEN ENERGY COMPANY, LLC

CLINTON POWER STATION, UNIT NO. 1

DOCKET NO. 50-461

1.0 INTRODUCTION

Title 10 of the *Code of Federal Regulations*, 50.55a (10 CFR 50.55a) requires that inservice inspection (ISI) of certain American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components be performed in accordance with Section XI of the ASME *Boiler and Pressure Vessel Code* (the Code), except where alternatives have been authorized or relief has been requested by the licensee and granted by the Commission pursuant to paragraphs (a)(3)(i), (a)(3)(ii), or (g)(6)(i) of 10 CFR 50.55a. In proposing alternatives or requesting relief, the licensee must demonstrate that: (1) the proposed alternatives provide an acceptable level of quality and safety; (2) compliance with the requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety; or (3) conformance with the requirements is impractical for its facility. Section 50.55a authorizes the Commission to authorize alternatives and to grant relief from ASME Code requirements upon making the necessary findings.

By letter dated October 27, 2000, AmerGen Energy Company, LLC (the licensee), submitted Relief Request 4206 for the second 10-year interval of the ISI program for Clinton Power Station (CPS).

2.0 RELIEF REQUEST 4206 (Revision 0)

2.1 System Components for which Relief is Requested

All ASME Code Class 1, 2, and 3 components subject to ultrasonic examination in accordance with ASME Section XI.

2.2 Code Requirements for which Relief is Requested

The licensee is requesting relief from the 1995 Edition with 1996 Addenda, Appendix VII to Section XI of the Code, Subarticle VII-4240 for qualifying ultrasonic testing (UT) personnel. Subarticle VII-4240 requires a minimum of 10 hours of annual UT training.

ENCLOSURE

2.3 Licensee's Proposed Alternative to Code

Pursuant to 10 CFR 50.55a(a)(3)(i), the licensee proposed conducting eight hours of hands-on training no earlier than six months prior to performing examinations (as identified in 10 CFR 50.55a(b)(2)(xiv)) in lieu of 10 hours of annual classroom training as required in ASME Section XI, Appendix VII, Subarticle VII-4240.

3.0 EVALUATION

Subarticle VII-4240, Appendix VII of Section XI of the Code requires 10 hours of annual training to impart knowledge of new developments, material failure modes, and any pertinent technical topics as determined by the licensee. No hands-on training or practice is required to be included in the 10 hours of training. This training is required of all UT personnel qualified to perform examinations of ASME Code Class 1, 2, and 3 systems. Independent of the ASME Code, 10 CFR 50.55a(b)(2)(xiv) imposes the requirement for Appendix VIII qualification that 8 hours of hands-on training with flawed specimens containing cracks be performed no earlier than 6 months prior to performing examinations at a licensee's facility. The licensee contends that this training will improve the quality of UT examination.

As part of the staff's rulemaking effort to revise 10 CFR 50.55a(b)(2), the issue of UT annual training requirements was reviewed. This review was included in the summary of comments to the rule (64 FR 51370). In the review, the staff determined that the 10 hours of annual training requirement specified in the ASME Code was inadequate for two reasons. The first reason was that the training does not require practice with flawed specimens. Practice with flaws is necessary because signals can be difficult to interpret. The second reason is related to the length of training and its frequency. Studies have shown that an examiner's capability begins to diminish within 6 months if skills are not maintained. Therefore, examiners must practice on a frequent basis to maintain their capability for proper interpretation of flaws.

Based on resolution of public comments for the above rulemaking, the staff accepted an industry approach advanced by the Electric Power Research Institute, which proposed 8 hours of hands-on practice with flawed specimens containing cracks. The practice would occur no earlier than 6 months prior to performing examinations at a licensee's facility. The approach was adopted in 10 CFR 50.55a(b)(2)(xiv) for personnel maintaining their Appendix VIII qualifications. The staff has determined that the proposed alternative to use 10 CFR 50.55a(b)(2)(xiv) in lieu of Subarticle VII-4240 will maintain the skill and proficiency of UT personnel at or above the level provided in the Code for annual UT training, thereby, providing an acceptable level of quality and safety.

4.0 CONCLUSION

Based on the discussion above, the staff has concluded that the proposed alternative to use the criteria in 10 CFR 50.55a(b)(2)(xiv) in lieu of Subarticle VII-4240 will provide an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), the proposed relief 4206 is authorized for the second 10-year ISI interval for CPS.

Principal Contributor: J. Hopkins

Date: October 5, 2001