

RS-10-117

10 CFR 50.55a

July 13, 2010

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

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

Subject: Third Inservice Inspection Interval Relief Request No. I3R-06 Related to Use of Code Case N-513-2

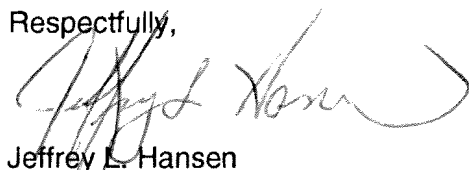
In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (a)(3)(i), Exelon Generating Company, LLC (EGC), hereby requests NRC approval of the following request for the third 10-year inservice inspection (ISI) program interval at Clinton Power Station, Unit 1 (CPS). The third ISI interval began July 1, 2010, and is scheduled to end on June 30, 2020. Approval of this request will allow CPS to utilize Code Case N-513-2, "Evaluation Criteria for Temporary Acceptance of Flaws in Moderate Energy Class 2 and 3 piping," to evaluate flaws in moderate energy piping, and potentially avoid unnecessary plant shutdowns. The details of this 10 CFR 50.55a request are enclosed in the attachment to this letter.

EGC requests approval of this request by July 13, 2011.

There are no regulatory commitments contained within this letter.

If you have any questions or require additional information, please contact Mitchel A. Mathews at (630) 657-2819.

Respectfully,



Jeffrey L. Hansen
Manager - Licensing and Regulatory Affairs

Attachment: 10 CFR 50.55a Request Number I3R-06

ATTACHMENT
10 CFR 50.55a Request Number I3R-06
Proposed Alternative Provides Acceptable Level of Quality and Safety
(10 CFR 50.55a(a)(3)(i))
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1.0 ASME CODE COMPONENTS AFFECTED:

Code Class: 2 and 3

References: IWA-2441(b) and American Society of Mechanical Engineers (ASME) Code Case N-513-2, "Evaluation Criteria for Temporary Acceptance of Flaws in Moderate Energy Class 2 or 3 Piping Section XI, Division 1"

Examination Category: NA

Item Number: NA

Description: Expanded Applicability for use of ASME Code Case N-513-2

Component Number: Moderate Energy Class 2 and 3 Piping

2.0 APPLICABLE CODE EDITION AND ADDENDA:

The Inservice Inspection program is based on the ASME Boiler and Pressure Vessel (B&PV) Code, Section XI, 2004 Edition, No Addenda.

3.0 APPLICABLE CODE REQUIREMENT:

IWA-2441(b) requires code cases be applicable to the ASME Edition and Addenda specified in the Inspection Plan.

ASME Code Case N-513-2 provides requirements that may be used to accept flaws without performing a repair or replacement activity for a limited time period.

4.0 REASON FOR REQUEST:

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested on the basis that the proposed alternative will provide an acceptable level of quality and safety.

On July 1, 2010, Clinton Power Station (CPS) started its Third 10-Year Inservice Inspection (ISI) program Interval under the requirements of the 2004 Edition of ASME Section XI. When implementing this Edition of ASME Section XI, Paragraph IWA-2441(b) requires code cases be applicable to the Edition and Addenda specified in the Inspection Plan.

ASME Code Case N-513-2 has an applicability limited to the 2003 Addenda, which is identified in Section 7.0 of the code case and in the latest applicability index of the ASME Code Cases. Since ASME Code Case N-513-2 only applies up to the 2003 Addenda of the ASME Code, Paragraph IWA-2441(b) does not allow the use of ASME Code Case N-513-2 during the third ISI interval at CPS.

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5.0 PROPOSED ALTERNATIVE AND BASIS FOR USE:

Exelon Generation Company, LLC (EGC) requests the applicability of ASME Code Case N-513-2 be extended to the 2004 Edition, No Addenda, for use during the Third 10-year ISI Program interval at CPS. The NRC has accepted the use of ASME Code Case N-513-2 as an acceptable method for evaluating the structural integrity of flaws identified in moderate energy piping in the latest revision of Regulatory Guide (RG) 1.147, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1," Revision 15.

No technical changes to ASME Code Case N-513-2 are being proposed in this relief request. This request is being submitted to correct a timing situation which has resulted from the application of the 2004 Edition of ASME Section XI for CPS. ASME Code Case N-513-3 has been approved by the ASME and includes a new applicability for the code case up to the 2008 Addenda of ASME Section XI. When this revision of the code case is reviewed and accepted for use by the NRC in RG 1.147, EGC will evaluate use of the revised case for inclusion in the CPS ISI Program Plan. Since no technical change is proposed in this relief request, EGC considers that this alternative provides an acceptable level of quality and safety, and is consistent with provisions of 10 CFR 50.55a(a)(3)(i).

6.0 DURATION OF PROPOSED ALTERNATIVE:

Relief is requested for the remainder of the Third 10-Year ISI interval at CPS, which began on July 1, 2010, and is currently scheduled to end on June 30, 2020.

7.0 PRECEDENTS:

Similar relief requests have been submitted for Millstone Power Station (i.e., References 4 and 5).

8.0 REFERENCES:

1. ASME Code Case N-513-2, "Evaluation Criteria for Temporary Acceptance of Flaws in Moderate Energy Class 2 or 3 Piping Section XI, Division 1," dated February 20, 2004
2. "Applicability Index for Section XI Cases," 2007 Edition, Supplement 8
3. NRC Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1," Revision 15, dated October 2007
4. Letter from J. A. Price (Dominion Nuclear Connecticut, Inc. (DNC)) to NRC, "Millstone Power Station Unit 3, Alternative Request IR-3-12 for the Use of ASME Code Case N-513-2", dated May 28, 2009

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5. Letter from J. A. Price (DNC) to NRC, "Millstone Power Station Unit 2 Relief Requests RR-04-02, Alternative VT-2 Pressure Testing Requirements for the Lower Portion of the Reactor Pressure Vessel, and RR-04-03, Alternative Evaluation Criteria for Code Case N-513-2, Temporary Acceptance of Flaws in Moderated Energy Class 2 or 3 Piping," dated March 30, 2010