Exelon Generation

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RS-14-295

10 CFR 50.55a

December 1, 2014

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-001

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

Subject: Proposed Alternative Testing Requirements for Code Class 1, 2, and 3 Snubbers

Pursuant to 10 CFR 50.55a, "Codes and Standards," paragraph (a)(3)(i), Exelon Generation Company, LLC (EGC), hereby requests NRC approval of a request for a proposed alternative to the requirements of the American Society of Mechanical Engineers (ASME), "Code for Operation and Maintenance of Nuclear Power Plants," Boiler and Pressure Vessel (B&PV) Code, Section XI, 2004 Edition and No Addenda for Clinton Power Station (CPS).

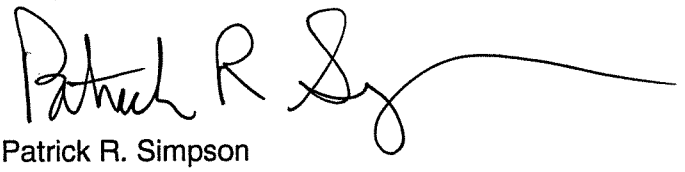
In accordance with 10 CFR 50.55a(b)(3)(v) the inservice testing of snubbers are performed in accordance with the 2004 Edition of ISTD Paragraph ISTD-5200. Paragraph ISTD-5200, "Inservice Operational Readiness Testing," requires CPS to perform snubber testing for operational readiness during each fuel cycle. CPS will be transitioning to a 12 month fuel cycle beginning in the Spring of 2015; performing a refueling outage every 12 months. CPS intends to alternately schedule one short outage that will focus primarily on refueling activities with minimal maintenance activities (i.e., "refueling only outages") and one more traditional refueling outage consisting of both refueling activities and maintenance activities (i.e., "refueling/maintenance outages"). This request proposes to allow testing of these snubbers on the current 24 month testing frequency. This will allow CPS to maintain a minimal amount of testing during the "refueling only outage" and still maintain the same level of quality and safety by continuing the two year frequency that these valves have historically been tested at during the "refueling/maintenance outage." The details of this request are provided in the attachment to this letter.

EGC requests approval of this relief request by December 31, 2015 to support scheduling for future refueling outages following the CPS transition to a 12 month fuel cycle.

There are no regulatory commitments contained in this letter.

Should you have any questions concerning this letter, please contact Mr. Timothy Byam at (630) 657-2818.

Respectfully,



Patrick R. Simpson
Manager – Licensing
Exelon Generation Company, LLC

Attachment: 10 CFR 50.55a Relief Request I3R-11 Proposed Alternative In Accordance with 10 CFR 50.55a(a)(3)(i)

cc: NRC Regional Administrator, Region III
NRC Senior Resident Inspector – Clinton Power Station
Illinois Emergency Management Agency – Division of Nuclear Safety

10 CFR 50.55a Relief Request I3R-11
Proposed Alternative
In Accordance with 10 CFR 50.55a(a)(3)(i)

Alternative Provides Acceptable Level of Quality and Safety

1. ASME Code Component(s) Affected:

Code Class:	1, 2, and 3 snubbers (it should be noted that Clinton Power Station (CPS) also performs inservice testing of those non-safety snubbers where failure affects a safety system)
Reference:	IWF-5300(b), Inservice tests shall be performed in accordance with ASME/ANSI OM, Part 4. In accordance with 10 CFR 50.55a(b)(3)(v) CPS is using ISTD 2004 Edition to perform inservice testing of snubbers.
Description:	ISTD-5200, Inservice Operational Readiness Testing – Snubbers shall be tested for operational readiness during each fuel cycle.
Component Name:	Snubbers; both mechanical and hydraulic

2. Applicable Code Edition and Addenda:

The CPS Inservice Inspection (ISI) program is based on the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, 2004 Edition and No Addenda.

In accordance with 10 CFR 50.55a(b)(3)(v) the inservice testing of snubbers are performed per 2004 Edition of ISTD Paragraph ISTD-5200.

3. Applicable Code Requirements:

IWF-5300(b), inservice tests shall be performed in accordance with ASME/ANSI OM, Part 4. In accordance with 10 CFR 50.55a(b)(3)(v) CPS is using ISTD 2004 Edition to perform inservice testing of snubbers. Paragraph ISTD-5200, Inservice Operational Readiness Testing, requires CPS to perform snubber testing for operational readiness during each fuel cycle.

4. Reason for Request:

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested for the proposed alternative to the Code requirements provided above on the basis that the use of the alternate snubber testing frequency discussed below will provide an acceptable level of quality and safety.

The current Code required frequency, each fuel cycle, is every two (2) calendar years. Due to economic reasons, CPS will be transitioning to a 12 month fuel cycle beginning in the Spring of 2015; requiring refueling outages every calendar year. CPS intends to alternately schedule one short outage that will focus primarily on refueling activities with minimal maintenance activities (i.e., "refueling only outages") and one more traditional refueling outage consisting of both refueling activities and maintenance activities (i.e., "refueling/maintenance outages").

Starting after May, 2015 (C1R15 Refueling outage), CPS will be having refueling outages each year. In order to meet the Code required frequency in ISTD-5200 CPS will have to perform snubber testing each calendar year. This in effect cuts the allowable testing frequency of the snubbers in half (i.e., 12 months vs 24 months). This change in outage scheduling and its Code implications do not provide a compensating increase in level of quality or safety.

5. Proposed Alternative and Basis for Use:

In lieu of the requirements of ASME Section XI and ISTD-5200 (i.e., testing every refueling outage), the proposed alternative is to test every two (2) calendar years or every other refueling outage.

At present, the requirements of ASME Section XI and ISTD-5200 testing frequencies are based on an 18 to 24 month fuel cycle. Consistent with this testing frequency, CPS has been operating on two (2) year fuel cycle and testing snubbers every refueling outage (i.e., every 24 months).

After May, 2015 (C1R15 Refueling outage), CPS will conduct refueling outages each year. Starting in the spring of 2015, following startup from refueling outage C1R15, CPS will begin annual operating cycles, with annual refueling outages. The C1R15 refueling outage will be a more traditional refueling outage consisting of both refueling activities and maintenance activities (i.e., "refueling/maintenance outages"). The following spring, in May 2016, refueling outage C1R16 will focus primarily on refueling activities with minimal maintenance activities (i.e., "refueling only outages"). In order to meet the Code required frequency in ISTD-5200 CPS will have to perform snubber testing each calendar year. Alternatively, CPS can maintain the current testing frequency of every 24 months by performing snubber testing every other refueling cycle or every two (2) calendar years. Use of this proposed alternative, testing snubbers every other refueling cycle or every two (2) calendar years, will maintain the current adequate level of quality and safety, and will provide reasonable assurance of structural integrity of systems supported by snubbers.

6. Duration of Proposed Alternative:

Relief is requested for the remaining duration of the Third Ten-Year ISI interval for CPS.