

RS-15-131

10 CFR 50.55a

May 1, 2015

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: Response to Request for Additional Information Regarding Proposed Alternative Testing Requirements for Code Class 1, 2, and 3 Snubbers

- References:
- (1) Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Proposed Alternative Testing Requirements for Code Class 1, 2, and 3 Snubbers," dated December 1, 2014, (ADAMS Accession No. ML14335A539)
  - (2) Letter from Blake Purnell (U. S. NRC) to Bryan C. Hanson (Exelon Generation Company, LLC), "Clinton Power Station, Unit 1 – Request for Additional Information Regarding Relief Request I3R-11 (TAC No. MF5334)," dated April 16, 2015, (ADAMS Accession No. ML15068A421)

In Reference 1, Exelon Generation Company, LLC, (EGC) requested, in accordance with 10 CFR 50.55a, "Codes and Standards," paragraph (a)(3)(i), NRC authorization 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).

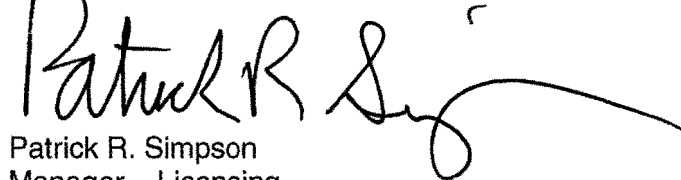
In accordance with 10 CFR 50.55a(b)(3)(v) the inservice testing of snubbers are performed in accordance with the 2004 Edition of ISTD Paragraph ISTD-5200. Paragraph ISTD-5200, "Inservice Operational Readiness Testing," requires CPS to perform snubber testing for operational readiness during each fuel 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 proposed allowing 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 snubbers have historically been tested at during the "refueling/maintenance outage."

In Reference 2, the NRC requested that EGC provide additional information to support their review of the subject relief request (i.e., Reference 1). The response to these requests is provided in Attachment 1. The information requested in Reference 2 was discussed during a February 23, 2015 teleconference between EGC and the NRC. As requested in Reference 2 it was agreed that EGC would provide the requested information to the NRC on or before May 29, 2015.

This letter contains no new regulatory commitments. If you have any questions concerning this letter, please contact Timothy A. Byam at (630) 657-2818.

Respectfully,

A handwritten signature in black ink, appearing to read "Patrick R. Simpson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

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

Attachment: Response to Request for Additional Information

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

ATTACHMENT  
Response to Request for Additional Information

In a letter from Blake Purnell (U.S. NRC) to Bryan Hanson (Exelon Generation Company, LLC), "Clinton Power Station, Unit 1 – Request for Additional Information Regarding Relief Request I3R-11 (TAC No. MF5334)," dated April 16, 2015, the following requests for additional information were provided.

*By application dated December 1, 2014 (Agencywide Documents Access and Management System Accession No. ML 14335A539), Exelon Generation Company, LLC (the licensee) submitted a request in accordance with Paragraph 50.55a(a)(3)(i) of Title 10 of the Code of Federal Regulations for a proposed alternative to the requirements of the American Society of Mechanical Engineers (ASME), Code for Operation and Maintenance of Nuclear Power Plants (OM Code), and ASME Boiler and Pressure Vessel (B&PV) Code, Section XI, 2004 Edition and no addenda for Clinton Power Station (CPS), Unit 1. The proposed alternative would permit the licensee to perform inservice testing of Code Class 1, 2, and 3 snubbers every 2 years or every other refueling outage in lieu of the requirement to perform testing every refueling outage. The reason for the request is to support the CPS transition from 2-year to 1-year refueling cycles.*

*The NRC staff has reviewed the relief request and determined that it needs additional information to complete its review.*

**NRC RAI 1:**

*The submitted relief request is for the third 10-year inservice inspection (ISI) interval at CPS. Provide the start and end dates of the third 10-year ISI interval.*

**EGC Response to NRC RAI 1:**

CPS is currently in the third ISI interval. As documented in Reference 1, the third ISI interval started on July 1, 2010 and will end on June 30, 2020.

**NRC RAI 2:**

*The relief request states that the proposed alternative to the snubber testing requirements in ASME B&PV Code, Section XI, and Section ISTD-5200 of the ASME OM Code is to test every 2 years or every other refueling outage. This implies that CPS has a choice of testing frequencies, such that if the refueling outage schedules change the interval between snubber tests may exceed 2 years. Provide justification for the proposed testing of every other refueling outage given that CPS is not limited to a 12-month refueling cycle.*

**EGC Response to NRC RAI 2:**

It was not the intent of EGC to allow CPS to have a choice of testing frequencies under the subject relief request. EGC intends to continue testing snubbers every 24 months consistent with the current snubber testing frequency. The wording used in the relief request was to support the EGC request for relief from the Code requirement of testing snubbers every refueling outage and allow testing every other refueling outage; which is equivalent to every 24 months.

**ATTACHMENT**  
Response to Request for Additional Information

**REFERENCE**

1. Letter from Robert D. Carlson (U. S. NRC) to Michael J. Pacilio (Exelon Generation Company, LLC), "Clinton Power Station, Unit No. 1 – Relief Requests I3R-01, I3R-02, I3R-03, I3R-04, and I3R-05 Associated with the Third Inservice Inspection Interval (TAC Nos. ME2987, ME2988, ME2989, ME2990, and ME2991)," dated December 22, 2010 (ADAMS Accession No. ML103360335)