

RS-20-045

10 CFR 50.55a

April 1, 2020

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: Response to Request for Additional Information Related to Relief Request I4R-05 for the Fourth Inservice Inspection Interval

- References:
1. Letter from D. M. Gullott (Exelon Generation Company, LLC) to U.S. NRC, "Relief Requests Associated with the Fourth Inservice Inspection Interval," dated December 16, 2019
 2. Email from J. Wiebe (U.S. NRC) to K. M. Nicely (Exelon Generation Company, LLC), "Request for Additional Information Regarding Clinton Relief Request I4R-05," dated March 25, 2020

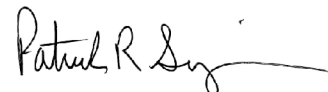
In Reference 1, in accordance with 10 CFR 50.55a, "Codes and standards," paragraph (z)(1), Exelon Generation Company, LLC (EGC) requested NRC approval of the several relief requests associated with the fourth Inservice Inspection (ISI) interval for Clinton Power Station (CPS), Unit 1. One of the relief requests (i.e., Relief Request I4R-05) was related to alternatives to performance of pressure tests and VT-2 visual examination requirements for Combustible Gas Control (HG) piping.

In Reference 2, the NRC requested additional information that is needed to complete review of Relief Request I4R-05, " Alternative to Performance of System Pressure Tests and VT-2 Visual Examination Requirements for the Inservice Inspection (ISI) Class 2 Combustible Gas Control (HG) Piping to and from Hydrogen Recombiners 0HG01SA and 0HG01SB." In response to this request, EGC is providing the attached information.

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There are no regulatory commitments contained within this letter. Should you have any questions concerning this letter, please contact Mr. Kenneth M. Nicely at (630) 657-2803.

Respectfully,

A handwritten signature in black ink that reads "Patrick R. Simpson". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Patrick R. Simpson
Sr. Manager Licensing

Attachment: Response to Request for Additional Information Regarding Relief Request I4R-05

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

ATTACHMENT
Response to Request for Additional Information Regarding Relief Request I4R-05

NRC Request

In reviewing the Exelon Generation Company's (Exelon's) submittal dated December 16, 2019 (ADAMS Accession No. ML19350C642), related to alternatives to performance of pressure tests and VT-2 visual examination requirements for Combustible Gas Control (HG) piping for the Clinton Power Station, Unit No. 1, the NRC staff has determined that the following information is needed in order to complete its review:

In its letter dated December 16, 2019, the licensee stated that a similar approach to test for leakage was used in the third inservice inspection (ISI) interval. In order to assess any degradation mechanisms that may impact its determinations regarding impacts on the level of quality and safety, the NRC staff requests information regarding any HG piping leakage that exceeded the administrative limits in the third ISI interval.

Response

HG piping leakage did not exceed the established administrative limits in the third ISI interval.