Clinton Power Station
8401 Power Road
Clinton, IL 61727

Constellation

U-604712

10 CFR 50.55a

June 23, 2022

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

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

Subject: Clinton Power Station Submittal of the Snubber Program Plan for the Fourth 10-Year Interval

In accordance with the American Society of Mechanical Engineers (ASME) Operations and Maintenance of Nuclear Power Plants (OM Code), Subsection ISTA-3200, "Administrative Requirements," paragraph (a), attached for your information is a copy of the Clinton Power Station (CPS) Snubber Program Plan for the fourth ten-year interval. The CPS fourth ten-year interval Snubber Program Plan complies with the requirements of the ASME OM Code 2012 Edition. The fourth ten-year interval for CPS Unit 1 began on July 1, 2020, and ends on June 30, 2030.

There are no regulatory commitments contained in this letter.

If you have any questions, please contact Mr. David Livingston, Regulatory Assurance Manager, at (217) 937-2800.

Respectfully,

Thomas D. Chalmers
Site Vice President
Clinton Power Station

Attachment: ER-CL-330-1008, Rev. 0, Snubber Program Plan, Fourth 10-Year Inservice Testing Interval

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

Exelon Generation.

CLINTON POWER STATION
8401 POWER ROAD
CLINTON, IL 61727

SNUBBER PROGRAM PLAN

FOURTH 10-YEAR INSERVICE TESTING INTERVAL

Commercial Service Date:	November 24, 1987
NRC Docket Number:	50-461
Fourth IST Interval:	July 1, 2020 through June 30, 2030

Document Number: ER-CL-330-1008
Revision Number: 00

PREPARED BY:	Timothy Seo Snubber Program Owner	DATE:	6/24/2020
REVIEWED BY:	Joseph Pawasarat Engineering Programs	DATE:	06/25/2020
APPROVED BY:	Marcellus Ruff Supervisor Engineering Programs	DATE:	6/24/2020

REVISION LOG

This program plan is the initial issue of the Snubber Program Plan after transition from the ASME ISI Code, Section XI to the ASME Division 1 OM Code, Section IST (hereinafter referred to as the ASME OM Code). Beginning July 1, 2020, the snubber program will be under the ASME OM Code and will thereafter be aligned with the IST 10 Year Interval. The Fourth IST 10 Year Interval is currently scheduled to end on June 30, 2030.

Description	Prepared By	Date	Reviewed By	Date	Approved By	Date
Fourth Interval Snubber Program Plan	_____		_____		_____	

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1.0 **General**:

1.1 The visual examination, service life monitoring and operational readiness testing of all safety related snubbers at Clinton Power Station (Clinton) will be implemented in accordance with ER-CL-330-1007, "Snubber Inservice Testing Program" to assess the required operational readiness of these snubbers during a seismic or other dynamic event.

1.2 The Snubber Program, as defined within ER-CL-330-1007, establishes visual examination, operational readiness testing and service life monitoring requirements, pertaining to all program snubbers that are required for safe shutdown of the reactor, maintaining the safe shutdown condition, mitigating the consequences of an accident, or ensuring the integrity of the reactor coolant pressure boundary.

1.3 The snubbers included in this program are identified within ER-CL-330-1007.

1.4 The Snubber Program described in ER-CL-330-1007 adheres to the requirements of the ASME OM Code, 2012 Edition, as required by 10CFR50.55a(b)(3)(v)(B).

2.0 **Examination, Testing and Monitoring Requirements**:

2.1 Visual examinations and operational readiness testing will be performed as specified within ER-CL-330-1007 and in accordance with Exelon fleet administrative procedures ER-AA-330-004 and ER-AA-330-010.

2.2 The examination boundaries are the snubber assembly from pin to pin inclusive.

2.3 Snubbers shall be examined, as specified in ER-CL-330-1007, prior to conducting any maintenance, stroking, or testing, and prior to removal, for any reason, from their installed location.

2.4 The Program Snubbers are grouped into Defined Test Plan Groups, (DTPG's) by design type, and in accordance with ISTD-5250, for testing purposes. The DTPG's at Clinton are specified in ER-CL-330-1007.

2.5 The service life of all snubbers in this program will be monitored and snubbers replaced or reconditioned as specified in ER-CL-330-1007 and required by Exelon fleet administrative procedure ER-AA-330-011 to ensure that the service life is not exceeded before the next scheduled system or plant outage, or during a period when the snubber is required to be operationally ready. The replacement or reconditioning of snubbers will be documented, and records retained in accordance with Clinton procedures.

3.0 **Examination and Testing Methods**:

3.1 Visual examinations will be performed by individuals qualified in accordance with ISTA-1500(e). Visual examinations and operational readiness testing shall be performed to verify the requirements specified within ER-CL-330-1007 in accordance with the requirements of Subsection ISTD of the ASME OM Code.

4.0 **Examination and Testing Frequency**:

4.1 Inservice visual examinations and pre and inservice operational readiness testing will be performed at the frequency specified within ER-CL-330-1007.

4.2 Preservice visual examinations will be performed whenever new snubber locations are installed, or after system replacements or modifications as specified in ER-CL-330-1007 in accordance with paragraph ISTD-4100 of the ASME OM Code.

5.0 **ASME OM Code Case OMN-13:**

5.1 Code Case OMN-13 Rev. 2, which allows the extension of the visual examination interval, may be used during the Fourth Ten Year IST Interval.6.0 **Examination, Testing and Monitoring Evaluation**:

6.1 Snubbers that do not appear to conform to the visual examination requirements of ER-CL-330-1007 and procedure ER-AA-330-004, will be evaluated and appropriate corrective action taken.

6.2 Snubbers that do not appear to conform to visual examination acceptance requirements and are later confirmed as functional as a result of operational readiness testing, may be declared acceptable for the purpose of establishing the next visual examination interval, providing that the unacceptable condition did not affect operational readiness of the snubber.

6.3 Snubbers that do not meet the operational readiness testing acceptance criteria in ER-CL-330-1007 and procedure ER-AA-330-010 will be evaluated to determine the cause of the failure and appropriate corrective action will be taken.

6.4 The service life of every snubber is evaluated at least once each fuel cycle using manufacturing input and engineering information gained through consideration of the snubber service conditions and inservice operational readiness test results in accordance with ER-CL-330-1007.

7.0 **Repair, Replacement and Modification Requirements**:

7.1 Repairs, replacements and modifications performed on snubbers under this program shall conform, as applicable, to the requirements specified within the Clinton Repair and Replacement Program.

8.0 **Scheduling**:

8.1 The Visual examinations and operational readiness testing schedules will be established, tracked and maintained within the Central Programs Engineering Department.

8.2 The Snubber Testing Program will identify, and track expanded, or additional testing and/or examinations as specified and required by ER-CL-330-1007 in accordance with Subsection ISTD of the ASME OM Code.

9.0 **Reports and Records**:

9.1 Reports and records for the visual examinations and operational readiness testing will be

maintained on all snubbers in the scope of the program as specified in ER-CL-330-1007.

9.2 Applicable records and reports, as required for repair and replacements, will be maintained for all snubbers as specified in ER-CL-330-1007.

9.3 Records of the service life of all program snubbers listed in this program, including the date at which the service life commences, and associated installation and maintenance records will be maintained as specified in ER-CL-330-1007.