

10CFR50.55a

September 6, 2019

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

Calvert Cliffs Nuclear Power Plant, Units 1 and 2
Renewed Facility Operating License Nos. DPR-53 and DPR-69
NRC Docket Nos. 50-317 and 50-318

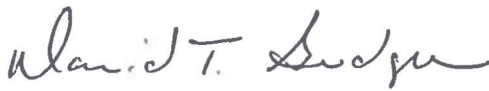
Subject: Submittal of the Update to the Fifth Ten-Year Interval Snubber
Inservice Testing Program Plan

In accordance with the ASME OM Code-2012 Edition, attached for your information is a copy of the Snubber Inservice Testing (IST) Program Plan for the Calvert Cliffs Nuclear Power Plant, Units 1 and 2, associated with the fifth ten-year IST interval that began on July 1, 2019. This copy of the program plan is being supplied for information only.

There are no regulatory commitments contained within this letter.

If you have any questions or require additional information, please contact David Neff at (267) 533-1132.

Sincerely,



David T. Gudger
Sr. Manager - Licensing
Exelon Generation Company, LLC

Attachment: Calvert Cliffs Nuclear Power Plant, Units 1 and 2, Snubber Inservice Testing
Program Plan for the Fifth Ten-Year Interval

cc: Regional Administrator, Region I, USNRC
USNRC Senior Resident Inspector, CCNPP
USNRC Project Manager, CCNPP
D. A. Tancabel, State of Maryland

ATTACHMENT

**Calvert Cliffs Nuclear Power Plant, Units 1 and 2
Snubber Inservice Testing Program Plan
Fifth Ten-Year Interval**



CALVERT CLIFFS NUCLEAR POWER PLANT
1650 Calvert Cliffs Parkway
Lusby, MD 20657

SNUBBER INSERVICE TESTING PROGRAM PLAN

UNIT 1
FIFTH 10-YEAR INTERVAL

Commercial Service Date: May 8, 1975
NRC Docket Number: 50-317
Fifth Interval: July 1, 2019 through June 30, 2028

UNIT 2
FIFTH 10-YEAR INTERVAL

Commercial Service Date: April 1, 1977
NRC Docket Number: 50-318
Fifth Interval: July 1, 2019 through June 30, 2028

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

PREPARED BY:	<u>Patrick Gannon</u> <i>Patrick Gannon</i>	DATE:	<u>6/25/2019</u>
	Snubber Program Owner		
REVIEWED BY:	<u>Danielle Mainardi</u>	DATE:	<u>6/26/2019</u>
	Engineering Programs		
APPROVED BY:	<u>Sailaja Mokkalapati</u>	DATE:	<u>7/1/19</u>
	Manager Engineering Programs		

Exelon Generation Company
Calvert Cliffs Nuclear Power Plant Units 1 & 2, Fifth Interval

REVISION LOG

This re-written program plan is the initial issue of the Snubber Program Plan after transition from the approved relief request for snubbers for Unit Nos. 1 and 2 (TAC Nos. ME4892 and ME4893) to the ASME OM Code, Section IST. The Calvert Cliff Nuclear Power Plant Units 1 and 2 Fourth Interval relief request is applicable through June 30, 2019. Beginning July 1, 2019, the snubber program will be under the OM Code, Section IST and will thereafter be aligned with the IST Interval. The Fifth IST Interval is currently scheduled to end on June 30, 2028.

Description	Prepared By	Date	Reviewed By	Date	Approved By	Date
Fifth Interval Snubber Program Plan	<u>Patrick Gannon</u>	6/25/19	<u>Danielle Mainardi</u>	6/26/19	<u>Sailaja Mokkalapati</u>	7/1/19

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Calvert Cliffs Nuclear Power Plant Units 1 & 2, Fifth Interval

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Calvert Cliffs Nuclear Power Plant Units 1 & 2, Fifth Interval

1.0 General:

- 1.1 The examination, service life monitoring and testing of all safety related snubbers at Calvert Cliffs Nuclear Power Plant (CCNPP) will be implemented and performed in accordance with ER-CA-330-1007, "Snubber Inservice Testing Program" to assess the required operational readiness of these snubbers during a seismic or other event, initiating dynamic loads.
- 1.2 The Snubber program, as defined within ER-CA-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 to ensure the integrity of the reactor coolant pressure boundary.
 - 1.2.1 The examination boundaries are the snubber assembly from pin to pin inclusive. Integral and nonintegral attachments for snubbers will be evaluated within the site ISI program, in accordance with the requirements of the ASME Code Section XI, 2013 Edition.
 - 1.2.2 The snubbers included in this program are identified within the ER-CA-330-1007 Snubber Program Document.
- 1.3 The Snubber Program described in ER-CA-330-1007 adheres to the requirements of ASME OM Code, Section IST, 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 to the extent specified within ER-CA-330-1007 and in accordance with Exelon fleet administrative procedures ER-AA-330-004 and ER-AA-330-010.
- 2.2 Snubbers are grouped into Defined Test Plan Groups, (DTPG's) by application, in accordance with the requirements of ISTD-5250 . The DTPG's at CCNPP Units 1 and 2 are specified in ER-CA-330-1007.
- 2.3 The Service Life of all snubbers in this program will be monitored and snubbers replaced or reconditioned as specified in ER-CA-330-1007 and required by Exelon fleet administrative procedure ER-AA-330-011 to ensure that the service life is not exceeded at or before the next scheduled system or plant outage, or during a period when the snubber is required to be operable. The replacement or reconditioning of snubbers will be documented, and records retained in accordance with CCNPP Procedures.

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Calvert Cliffs Nuclear Power Plant Units 1 & 2, Fifth Interval

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-CA-330-1007 in accordance with the requirements of Subsection ISTD.

4.0 Examination and Testing Frequency:

- 4.1 Visual Examinations and Operational Readiness Testing will be performed at the frequency specified within ER-CA-330-1007.
- 4.2 Visual Examinations will be performed whenever new snubber locations are installed, or after system replacements or modifications in accordance with Subsection ISTD-4100.

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, is approved for use by the NRC in Regulatory Guide 1.192 Rev. 2 (March 2017) and may be used during the Fifth Interval once prerequisites have been satisfied.

6.0 Examination, Testing and Monitoring Evaluation:

- 6.1 Snubbers that do not appear to conform to the Visual Examination requirements of ER-CA-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 the visual examination acceptance requirements and are later confirmed as operable, as a result of operational readiness testing, may be declared operable 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-CA-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 a 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-CA-330-1007.

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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 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 Corporate 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-CA-330-1007 and, in accordance with Subsection ISTD.

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.
- 9.2 Applicable records and reports, as required for Repair and Replacements, will be maintained for all snubbers.
- 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.