

From: Wiebe, Joel
Sent: Thursday, January 9, 2020 9:46 AM
To: Nicely, Ken M.: (GenCo-Nuc) (ken.nicely@exeloncorp.com)
Subject: Acceptance Review for Clinton, Unit 1, 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

Hi Ken,

By letter dated December 16, 2019 (Agencywide Documents Access and Management System Accession No. ML19350C642), Exelon Generation Company, LLC submitted a proposed alternative (Request I4R-05) in accordance with 10 CFR 50.55a(z)(2) for the alternate system pressure tests and VT-2 visual examination of Combustible Gas Control Piping on the basis that compliance with the specified ASME requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety for the Clinton Power Station, Unit 1. The purpose of this e-mail is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this proposed alternative. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant. The acceptance review determination for other requests in the December 16, 2019, submittal will be provided by separate e-mail.

The NRC staff has reviewed the submittal and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed request in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. If additional information is needed, you will be advised by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this request will take approximately 100 hours to complete. The NRC staff expects to complete this review in approximately 12 months, which is December 2020. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager.

If you have any questions, please contact me at (301) 415-6606.

Joel S. Wiebe, Sr. Project Manager
Plant Licensing Branch III-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

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