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NRG Energy, Inc.
Don Claybaugh
VP, MIDWEST PLANT OPERATIONS
Joliet Generating Station Annex
1800 Channahon Rd
Joliet, IL 60436

VIA OVERNIGHT MAIL

DEC 16 2014

December 12, 2014

Illinois Commerce Commission
GAS PIPELINE SAFETY

Darin R. Burk
Manager- Pipeline Safety
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62701

Re: Inspection Report # 2014-P-00456; Notice of Amendments from Illinois Commerce Commission dated November 18, 2014 (NOA 2014-A001-00128 through 2014-A001-00132)

Dear Mr. Burk:

This letter is in response to your letter dated November 18, 2014 relating to Inspection Report # 2014-P-00456 of NRG Wholesale Generation LP ("NRG") Operation and Maintenance Manual ("O&M") at the Shelby County Generating Station on October 28-30, 2014. NRG is in receipt of the letter and will be providing its amended procedures to the Illinois Commerce Commission ("ICC") by February 16, 2015.

Included in this response are actions to be taken for each of the NOA findings.

NOA # 2014-A001-00129

Amended O&M procedures will be provided to ICC by February 16, 2015 to include underground clearance requirements for transmission pipeline.

NOA # 2014-A001-00132

Amended O&M procedures will be provided to ICC by February 16, 2015 to include minimum cover requirements by location and soil conditions for buried transmission pipeline.

NOA # 2014-A001-00128

Amended O&M procedures will be provided to ICC by February 16, 2015 to include 8 hour strength test requirements for steel pipeline to operate at a hoop stress of 30 percent or more of SMYS.

NOA # 2014-A001-00131

Amended O&M procedures will be provided to ICC by February 16, 2015 to include 4 hour strength test requirements for steel pipeline to operate at a hoop stress of 30 percent or more of SMYS, for fabricated units and short sections of pipe, for which a post installation test is impractical.

NOA # 2014-A001-00130

Amended O&M procedures will be provided to ICC by February 16, 2015 to include reporting of suspected violations requirements per IL ADM. CODE. Title 83: Part 265, Subpart B, Section 265.100.

Please contact Gil Smith at 217 844 4404 or email Gil.Smith@NRG.com for questions. You may also contact me via email at Donald.Claybaugh@nrg.com or 815 347 5425 if you have any questions regarding this letter.

Sincerely,

Don Claybaugh

GIL SMITH OPERATIONS MANAGER
FOR DON CLAYBAUGH

Vice President
NRG Midwest Plant Operations

Smith, Gil E.

From: Claybaugh, Donald
Sent: Friday, December 12, 2014 12:25 PM
To: Smith, Gil E.
Subject: ICC letter re pipeline inspections at Shelby Station
Attachments: Response Letter - ICC final.docx

Gill,
As discussed by phone, please sign the attached letter on my behalf i.e. Gill Smith, Plant Manager for Don Claybaugh.
Mail it overnight certified.
Thanks.



Power to be free

Don Claybaugh
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