



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

VIA OVERNIGHT MAIL

January 12, 2015

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

**RECEIVED**

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**Illinois Commerce Commission  
GAS PIPELINE SAFETY**

Re: Inspection Report # 2014-P-00456; Notice of Amendments ("NOA") 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 responded to your letter December 12, 2014 and as stated in response letter we are providing amended procedures to the Illinois Commerce Commission ("ICC").

Included with this response are amended pages from O&M Manual specific to the NOA findings.

NOA # 2014-A001-00129  
Underground clearance requirements for transmission lines.  
Page 2 of amended O&M procedure ("3. Underground Clearance and Cover:")

NOA # 2014-A001-00132  
Minimum cover requirements by location and soil conditions for buried transmission line.  
Page 2 of amended O&M procedure ("3. Underground Clearance and Cover:")

NOA # 2014-A001-00128  
8 hour Strength test requirements for steel pipeline to operate at a hoop stress of 30 percent or more of SMYS.  
Page 2 of amended O&M procedure ("2. Strength Test Requirements:")

NOA # 2014-A001-00131  
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.  
Page 2 of amended O&M procedure ("2. Strength Test Requirements:")

NOA # 2014-A001-00130  
Reporting of Suspected Violations requirements per IL ADM. CODE. Title 83: Part 265, Subpart B, Section  
Pages 110 and 111 of amended O&M procedure ("8. Facility Damage:")

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

Sincerely,

  
Don Claybaugh

VP, MIDWEST PLANT OPERATIONS