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U-603357
8E.100a

April 24, 2000

Docket No. 50-461

10CFR50.90

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Clinton Power Station Proposed Amendment of Facility Operating License No. NPF-62 to Allow One-Time Extension of Surveillance Test Intervals (LA-00-003)

Dear Madam or Sir:

Pursuant to 10 CFR 50.90, AmerGen Energy Company, LLC (AmerGen) hereby requests amendment of Facility Operating License No. NPF-62 for Clinton Power Station (CPS). Specifically, AmerGen requests a change for the applicable Technical Specifications related to logic system functional testing of the Primary Containment and Drywell Isolation Instrumentation and the Suppression Pool Makeup System Instrumentation to allow a one-time extension of the associated surveillance test intervals.

Recently, on December 16, 1999, via letter U-603300, AmerGen requested a one-time extension of various CPS Technical Specification (TS) surveillance intervals to support elimination of a planned Spring 2000 mid-cycle outage (PO-8). This request was approved on March 17, 2000, through the issuance of Amendment 125. Subsequent to the issuance of Amendment 125, CPS personnel discovered that additional surveillance test extensions are necessary. The failure to identify all required surveillance tests which required extension to obviate the need for PO-8 has been entered in the CPS corrective action program. Extensive reviews have been performed to ensure that the required surveillance test extensions have been identified and included in this amendment request. The need for this amendment request and the scope of the request has been discussed with Mr. Jon B. Hopkins, Nuclear Reactor Regulation, Clinton Project Manager.

TS Surveillance Requirements (SR) SR 3.3.6.1.6 and SR 3.3.6.4.7 are 18-month surveillance requirements that will expire prior to Refueling Outage No. 7. Therefore, it is requested that the interval of these SRs be extended on a one-time basis to

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November 30, 2000, similar to those extensions approved in Amendment 125. Prompt NRC review is respectfully requested because approval of this one-time extension would eliminate the potential for an unplanned transient if the associated surveillance tests are performed with the plant on line, and also would prevent a plant shutdown solely to perform the surveillance tests associated with these SRs. A plant shutdown would cause an unnecessary transient on the plant and result in additional radiation exposure to personnel, since the surveillances associated with SRs 3.3.6.1.6 and 3.3.6.4.7 would need to be repeated during the refueling outage. Insomuch as the earliest surveillance expires on June 14, 2000, review and approval of this application for Amendment is requested by June 1, 2000.

The extensions requested here are similar to one-time surveillance extension requests previously approved in Amendment 125 and for Fermi 2 and River Bend. Also, several plants have received or are in the process of receiving approvals to extend their operating cycle permanently to 24 months. In either case, the guidance of Generic Letter (GL) 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991, was used to prepare those submittals. Accordingly, for CPS, AmerGen has also utilized the guidance of GL 91-04 to evaluate the acceptability of extending the surveillance intervals for the applicable Technical Specification SRs.

The evaluations performed for the surveillance interval extensions approved in Amendment 125 included such considerations as current performance of the affected systems or components, previous surveillance results obtained, maintenance history and what failures (if any) have occurred or been identified in recent history (and what corrective action was taken to preclude recurrence), the length of the interval extensions, and qualitative risk considerations such as redundant equipment availability, and what other tests are or have been performed to confirm the operability/availability of the affected systems or components as well as for redundant systems or components. These evaluations support the conclusion that the effect of extending the surveillance intervals for the affected equipment is small, thus supporting the acceptability of such extensions. The justification to extend SRs 3.3.6.1.6 and 3.3.6.4.7 is based on essentially the same justification as that provided in AmerGen's original request approved through the issuance of Amendment 125.

Essential details and information to support this request are provided in the Attachments and Enclosures to this letter. Attachment 2 provides a description, justification, and a table that lists the TS SRs for which extensions are being requested. Attachment 2 also provides a general basis for requesting the SR interval extensions, as it includes background information and a description of how the Technical Specifications are to be changed to permit the extensions. The table identifies, for each SR, the number of days that the SR interval is being extended based on the SR's current expiration date (i.e., the specified interval plus the 25% allowance permitted by the Technical Specifications) and the proposed extension date of November 30, 2000. Attachment 3 provides the evaluation for no significant hazards consideration, wherein it is concluded that, based on an evaluation of the proposed changes against the criteria of 10CFR50.92,

no significant hazards consideration is involved. Attachment 3 also provides an evaluation against the 10 CFR 51.22 criteria for environmental considerations. The revised Technical Specification pages are provided in Attachment 4, and an affidavit supporting the facts set forth in this letter and its enclosures is included in Attachment 1.

This application for amendment of the CPS Operating License was reviewed by the site Facility Review Group and the AmerGen Nuclear Review Board.

Sincerely yours,

Michael T. Coyle
Vice President

JLP/blf

Attachments/Enclosures

cc: NRC Clinton Licensing Project Manager
Regional Administrator, USNRC Region III
NRC Resident Office, V-690
Illinois Department of Nuclear Safety

AFFIRMATION

Michael T. Coyle, being first duly sworn, deposes and says: That he is Vice President for Clinton Power Station; that this application for amendment of Facility Operating License No. NPF-62 has been prepared under his supervision and direction; that he knows the contents thereof; and that the letter and the statements made and the facts contained therein are true and correct to the best of his knowledge and belief.

Date: This 24th day of April 2000.

Signed: Michael T. Coyle
Michael T. Coyle
Vice President

STATE OF ILLINOIS)
) SS.
DeWitt COUNTY)

* OFFICIAL SEAL *
Jacqueline S. Matthias
Notary Public, State of Illinois
My Commission Expires 11/24/2001

Subscribed and sworn to before me this 24th day of April 2000.

Jacqueline S. Matthias
(Notary Public)

DESCRIPTIONS AND JUSTIFICATIONS FOR SURVEILLANCE TEST INTERVAL EXTENSIONS

BACKGROUND/REASON FOR REQUEST:

The proposed amendment to the Clinton Power Station (CPS) Operating License would permit one-time extensions of the test intervals for surveillances that were scheduled to be performed during a planned Spring 2000 mid-cycle outage (PO-8). Due to the extended plant shutdown/refueling outage following Cycle 6 operation, and with the elimination of PO-8, AmerGen Energy Company, LLC (AmerGen) is planning to continue CPS operation through October 15, 2000 which is the planned start date for the next (seventh) refueling outage (RF-7).

On May 2, 1999, plant startup commenced following the sixth refueling outage (RF-6) which officially began on October 13, 1996, after a forced shutdown that began on September 6, 1996. On May 6, 1999, the reactor was taken critical, and on May 26, 1999, RF-6 officially ended when the generator was synchronized to the grid. The extensive length of RF-6, along with encountered delays and uncertainty in the projected startup date from RF-6, presented challenges to the scheduling of long-term surveillances with respect to selecting those to be re-performed prior to startup and those anticipated to be performed during the next refueling outage. These issues particularly impacted the 18-month surveillance test intervals required by the Technical Specifications. Consequently, some of these surveillances were scheduled to be performed during PO-8.

Since restart from RF-6, however, Clinton Power Station (CPS) has been operating well and has achieved more than 300 days of continuous operation with an approximate 99 percent capacity factor. PO-8 was planned to perform required surveillance testing and necessary corrective maintenance if conditions warranted a plant shutdown. However, plant systems have been operating well and plant performance has been good. Further, other work, preventive maintenance, and modification activities planned for PO-8 have been evaluated for postponement to RF-7. In light of these considerations, PO-8 has been determined not to be necessary and was the basis for the issuance of Amendment 125. Subsequent to the issuance of Amendment 125, however, CPS personnel discovered that additional surveillance test extensions are necessary due to omissions in the original request. This condition is being tracked in the CPS correction action program.

To support continuous plant operation until RF-7 (without performing the surveillances that would otherwise be due prior to RF-7), a one-time change is being requested to extend the surveillance intervals for the TS SRs listed in the table of this attachment. These SRs are due prior to the beginning of RF-7 and should not be conducted during power operations because of the potential impact on plant safety or the potential for an unplanned plant transient. AmerGen proposes to amend the TS (as further discussed below) to allow the subject surveillance tests to be performed during RF-7. The applicability of the extension would be through November 30, 2000.

Approval of the requested surveillance interval extensions will prevent a plant shutdown solely to perform surveillance tests that would otherwise exceed the surveillance interval of 18 months plus the allowable extension to the interval (25%) specified in TS SR 3.0.2.

Since most of the surveillances would need to be repeated during the next refueling outage, a surveillance outage would cause an unnecessary transient on the plant and result in additional radiation exposure to personnel.

As noted in the cover letter, the proposed one-time surveillance extensions were evaluated, in part, using the guidance provided in NRC Generic Letter 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991. In Generic Letter 91-04, the NRC provided generic guidance for evaluating the impact of adopting a 24-month surveillance test interval. This guidance was utilized, as appropriate, in the technical evaluations performed to justify the one-time surveillance extensions discussed herein. Specifically, surveillance/failure history reviews were performed for each of the extended SRs, and consideration was given to other testing that would continue to be performed on the affected equipment or components, as well as the availability of redundant equipment or components (including the testing performed on that equipment), during the extended portion of the SR intervals. It should be noted that since many SRs are implemented in parts via several surveillance test procedures, and not all of those portions or procedures require deferral of their scheduled performance, the evaluations described in this attachment focused mainly on the test procedure(s) or portion(s) of the surveillance for which the test interval extension is needed.

This attachment contains a table that lists the TS SRs for which extensions are being requested. This table also identifies, for each SR, the number of days from the SR current expiration date to the requested extension date of November 30, 2000 (i.e., the number of days that the SR would by extended). In general, where more than a single component or division of equipment is tested to meet the SR, the longest extension needed for any one of the components tested is listed. To prevent possible confusion associated with multiple extension dates for a single procedure, a complex revision to the surveillance tracking system, or the possible consequences of missed surveillances, the same extension period is being requested for all Technical Specification line items associated with a single surveillance procedure.

As also indicated in the cover letter, License Amendment 125 was approved by the NRC for CPS, and similar surveillance interval extension requests (either on a one-time or permanent basis) have been previously approved for Fermi 2, River Bend, Nine Mile Point 2 and D.C. Cook. The license amendments issued for these requests permitted surveillance intervals to be extended up to 30 months. For CPS, the longest extended interval requested for any SR discussed herein is approximately 29 months. Thus, none of the SR interval extensions for CPS will exceed previously-approved interval extensions.

DESCRIPTION OF PROPOSED CHANGES TO THE TECHNICAL SPECIFICATIONS

To extend the test intervals for all of the applicable SRs, a change to TS SR 3.0.2 is proposed to revise Table 3.0.2-1 that lists all of the applicable SRs that require an extension of surveillance intervals to November 30, 2000. This table provides, for each SR, a brief description of the surveillance test, including the affected system, component or Function. The proposed changes consist mainly of listing additional line items on the table to incorporate the additional SRs for which test interval extensions are needed (as addressed in this submittal).

The proposed changes, as they would appear in the CPS Technical Specifications, are specifically indicated in Attachment 4. The Attachment contains a marked-up copy of pages 3.0-8 and 3.0-9 for the CPS Technical Specifications.

3.3.6.1 Primary Containment and Drywell Isolation Instrumentation

The primary containment and drywell isolation instrumentation automatically initiates closure of certain primary containment isolation valves (PCIVs) and drywell isolation valves. The function of the PCIVs, in combination with other accident mitigation systems, is to limit fission product release during and following postulated Design Basis Accidents (DBAs). Primary containment isolation within the time limits specified for those isolation valves designed to close automatically ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a DBA. The isolation of drywell isolation valves, in combination with other accident mitigation systems, functions to ensure that steam and water releases to the drywell are channeled to the suppression pool to maintain the pressure suppression function of the drywell.

Primary Containment and Drywell Isolation Instrumentation (TS Table 3.3.6.1-1)

Item 2.a, Reactor Vessel Water Level - Low Low, Level 2 - Low Reactor Vessel Water Level indicates the capability to cool the fuel may be threatened. The valves whose penetrations communicate with the primary containment are isolated to limit the release of fission products. The isolation of the primary containment on Level 2 supports actions to ensure that the offsite dose limits of 10 CFR 100 are not exceeded. The Reactor Vessel Water Level - Low Low, Level 2 Function associated with automatic isolation capability is implicitly assumed in the USAR as the associated leakage paths are assumed to be isolated post accident.

Justification for Extension of TS SR 3.3.6.1.6 Test Interval

The SRs for the Primary Containment and Drywell Isolation instrumentation include a requirement for performance of a Logic System Functional Test (LSFT). The LSFT

demonstrates the Operability of the required trip logic for all of the specified trip Functions. The specified test interval for SR 3.3.6.1.6 is 18 months.

This surveillance test is applicable, in particular, to the following Primary Containment and Drywell Isolation Function: Reactor Vessel Water Level - Low Low, Level 2 (Item 2.a). The LSFT requirement is implemented by many overlapping steps or portions such that the performance of many test procedures is required to complete the entire scope of required testing. The procedure that tests the above Function is the procedure used to perform the logic system functional testing of the high radiation input used for primary and secondary containment isolation. The logic affected by this test procedure includes logic to which the Reactor Vessel Water Level-Low Low, Level 2 Function is an input.

To validate the acceptance for increasing the surveillance test interval, a review of the surveillance test history and an evaluation of the functional testing performance were performed for the last two operating cycles for the associated Primary Containment and Drywell Isolation Instrumentation Function. This review focused on the above-noted surveillance test, since this is the specific procedure requiring the test interval extension. There were no failures to meet the surveillance test acceptance criteria identified in this review.

The surveillance that tests the Function associated with SR 3.3.6.1.6, Table 3.3.6.1-1, Item 2.a, expires on July 10, 2000, and its test interval therefore requires an extension of 143 days to reach the end of the refueling outage.

The proposed one-time extension of the interval for SR 3.3.6.1.6 (i.e., for the above-noted surveillance tests) has little or no effect on the Primary Containment and Drywell Isolation initiation logic. This SR ensures that the Primary Containment and Drywell Isolation initiation logic functions, as designed, in response to an analyzed condition. Extending the surveillance test interval for the LSFT is acceptable because the Primary Containment and Drywell Isolation Instrumentation Functions are verified to be operating properly throughout the operating cycle by the performance of other procedures including Channel Checks, Channel Calibrations, and Channel Functional Tests. These tests ensure that a significant portion of the Primary Containment and Drywell Isolation initiation circuitry is operating properly and will detect significant failures of this circuitry. The proposed extension is necessary because the potential for an unplanned transient exists if the surveillance test is performed with the plant on line.

Additional justification for extending the surveillance test interval is that the Primary Containment and Drywell Isolation network, including the actuating logic, is designed to be single failure proof and therefore is highly reliable. This is acknowledged in the NRC Safety Evaluation Report (dated August 2, 1993) relating to extension of surveillance test intervals for Peach Bottom Atomic Power Station, Unit Numbers 2 and 3, from 18 to 24 months:

"Industry reliability studies for boiling water reactors (BWRs), prepared by the BWR Owners Group (NEDC-30936P) show that the overall safety systems' reliabilities are not dominated by the reliabilities of the logic system, but by that of the mechanical components, (e.g., pumps and valves), which are consequently tested on a more frequent basis. Since the probability of a relay or contact failure is small relative to the probability of mechanical component failure, increasing the logic system functional test interval represents no significant change in the overall safety system unavailability."

Based on the historical failure review, the inherent system and component reliability, and the testing performed during the operating cycle, the impact, if any, from this change on system availability is small. Therefore, the requested extension is justified.

3.3.6.4 Suppression Pool Makeup System Instrumentation

Description

Technical Specification 3.3.6.4 requires, in part, that instrumentation channels be demonstrated Operable by performance of Channel Functional Tests, Logic System Functional Tests, and Response Time Tests for the operational condition and intervals specified in Table 3.3.6.4-1 for each Function. The instrument channels or Functions for which surveillance interval extensions are requested are addressed below.

Instrumentation Functions (TS Table 3.3.6.4-1)

Item 1 - Drywell Pressure - High - High pressure in the drywell could indicate a break in the reactor coolant pressure boundary. The Drywell Pressure - High Function is one of the Functions required to be capable of initiating the Suppression Pool Makeup (SPMU) System during a postulated accident. This protection is required to ensure primary containment temperature and pressure design limits are not exceeded during a Loss of Coolant Accident (LOCA). Accident analysis assumes that the suppression pool vents remain covered during a LOCA. Therefore, the Drywell Pressure - High signal is used to initiate dumping of water from the upper containment pool into the suppression pool (to increase the suppression pool water volume) as assumed in the large break LOCA analysis.

Item 2 - Reactor Vessel Water Level - Low Low Low, Level 1 - Low reactor vessel water level indicates that a LOCA may have occurred and the capability to maintain the primary containment temperature and pressure and suppression pool level design limits may be threatened. Accident analysis assumes that the suppression pool vents remain covered during a LOCA. Therefore, the low reactor vessel water level signal is used to initiate dumping of water from the upper containment pool into the suppression pool (to increase the suppression pool water volume) as assumed in the large break LOCA analysis.

Item 3 - Suppression Pool Water Level - Low Low - The Suppression Pool Water Level - Low Low signal provides assurance that the water level in the suppression pool will not drop below that required to keep the suppression pool vents covered for all LOCA break sizes. Accident analysis assumes that the suppression pool vents remain covered during a LOCA. Therefore, the signal indicating low suppression pool water level is used to dump water from the upper containment pool into the suppression pool (to increase the suppression pool water volume) as assumed in the LOCA analysis.

Item 4 - Timer - The SPMU System valves open on a Drywell Pressure - High and/or Reactor Vessel Water Level - Low Low Low, Level 1 signal after about a 30 minute timer delay, where the timer itself is started by these signals. The minimum suppression pool volume, without an upper pool dump, is adequate to meet all heat sink requirements for 30 minutes during a small break LOCA.

Item 5 - Manual Initiation - The SPMU System Manual Initiation hand switch channels produce signals to provide manual initiation capabilities that are redundant to the automatic protective instrumentation. The Manual Initiation Function is not assumed in any transient or accident analysis in the Updated Safety Analysis Report (USAR). However, the Function is retained in the Technical Specifications for the SPMU System as required by the NRC in the approved licensing basis.

Justification for Extension of TS SR 3.3.6.4.7 Test Interval

The TS SRs for the SPMU Instrumentation Functions include a requirement for performance of a Logic System Functional Test (LSFT) for SR 3.3.6.4.7. The LSFT demonstrates the Operability of the required initiation logic for the specified instrumentation Functions. The specified test interval for SR 3.3.6.4.7 is 18 months.

The LSFT ensures, in part, that all of the SPMU instrumentation functions and associated logic are operable as required. As such, the Logic System Functional Test requirement is implemented by many overlapping steps or portions such that the performance of many test procedures is required to complete the entire scope of required testing. The test procedure for which the interval extension is needed (for all of the required Functions) is the procedure used to functionally test the Suppression Pool Makeup System by actuating the system logic via simulated actuation from the drywell pressure, the reactor pressure vessel water level, and the manual initiation signals and verifying proper sequencing of the controls and system responses. The procedure that tests these Functions is the diesel generator integrated testing procedure, which can only practically be performed during shutdown conditions. (Testing performed per the diesel generator integrated procedure(s) includes effecting ECCS initiation signals that are also used to test the Suppression Pool Makeup System logic.) The proposed extension is necessary because the potential for an unplanned transient, such as an inadvertent upper pool dump, exists if the surveillance test is performed on line.

To validate the acceptance for increasing the surveillance test interval, a review of the surveillance test history and an evaluation of the functional testing performance were performed for the last operating cycle only. Data does not exist for previous operating cycles due to inadequacies in testing portions of logic circuitry. [Reference CPS Licensee Event Report 1997-031]. This review focused on the diesel generator integrated testing procedure, since as noted above, it is the specific procedure requiring the test interval extension. There were no failures to meet the surveillance test acceptance criteria identified in the review for the SPMU LSFT SR.

The surveillance procedure that tests SR 3.3.6.4.7, Table 3.3.6.4-1, Items 1 through 5, expires on June 14, 2000, and its test interval therefore requires an extension of 169 days to reach the end of the refueling outage.

The proposed one-time SR interval extension has little or no effect on the SPMU initiation logic. This SR ensures that the SPMU initiation logic will function, as designed, in response to an analyzed condition. Extending the surveillance test interval for the LSFT is acceptable because the SPMU Functions are verified to be operating properly throughout the operating cycle by the performance, in part, of other test procedures including Channel Checks, Channel Calibrations, and Channel Functional Tests. These tests ensure that a significant portion of the SPMU circuitry is operating properly and will detect significant failures of this circuitry. Additional justification for extending the surveillance test interval is that the SPMU instrumentation, including the actuating logic, is designed to be single failure proof and therefore is highly reliable. This is acknowledged in the NRC Safety Evaluation Report (dated August 2, 1993) relating to extension of surveillance test intervals for the Peach Bottom Atomic Power Station, Unit Numbers 2 and 3 from 18 to 24 months:

> "Industry reliability studies for boiling water reactors (BWRs), prepared by the BWR Owners Group (NEDC-30936P) show that the overall safety systems' reliabilities are not dominated by the reliabilities of the logic system, but by that of the mechanical components, (e.g., pumps and valves), which are consequently tested on a more frequent basis. Since the probability of a relay or contact failure is small relative to the probability of mechanical component failure, increasing the logic system functional test interval represents no significant change in the overall safety system unavailability."

Based on the historical failure review, the inherent system and component reliability, and the testing performed during the operating cycle, the impact, if any, from this change on system availability is small. Therefore, the requested extension is justified.

CLINTON POWER STATION

LOGIC SYSTEM FUNCTIONAL TESTING

TECHNICAL SPECIFICATION SR	EXTENDED DATE	MAXIMUM DAYS EXTENSION	DESCRIPTION OF SR REQUIREMENT
3.3.6.1.6, Table 3.3.6.1-1, Item 2.a	11/30/2000	143	Primary Containment and Drywell Isolation, Reactor Vessel Water Level - Low Low, Level 2, LSFT
3.3.6.4.7, Table 3.3.6.4-1, Item 1	11/30/2000	169	Suppression Pool Makeup, Drywell Pressure - High, LSFT
3.3.6.4.7, Table 3.3.6.4-1, Item 2	11/30/2000	169	Suppression Pool Makeup, Reactor Vessel Water Level - Low Low Low, Level 1, LSFT
3.3.6.4.7, Table 3.3.6.4-1, Item 3	11/30/2000	169	Suppression Pool Makeup, Suppression Pool Water Level - Low Low, LSFT
3.3.6.4.7, Table 3.3.6.4-1, Item 4	11/30/2000	169	Suppression Pool Makeup, Timer, LSFT
3.3.6.4.7, Table 3.3.6.4-1, Item 5	11/30/2000	169	Suppression Pool Makeup, Manual Initiation, LSFT

NO SIGNIFICANT HAZARDS EVALUATION AND ENVIRONMENTAL IMPACT CONSIDERATION

AmerGen Energy Company, LLC (AmerGen) has concluded that the proposed changes to the CPS Technical Specifications, to facilitate a one-time extension of the test intervals for the subject surveillance requirements, do not involve a Significant Hazards Consideration. In support of this determination, an evaluation of each of the three standards set forth in 10CFR50.92 is provided below.

1. **The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.**

   The proposed Technical Specification (TS) changes involve a one-time only change in the surveillance test intervals of selected Surveillance Requirements (SRs). As such, the Operability requirements for systems, structures, and components required by the Technical Specifications remain unchanged. Further, the proposed TS changes do not impact the TS surveillance performance requirements themselves nor the way in which the surveillances are performed, since only the test intervals are affected for the identified SRs. The proposed TS changes do not physically involve any changes to the plant, nor do they impact any design or functional requirements of the associated systems. Thus, the proposed TS changes do not increase the challenges of any safety systems assumed to function in the accident analysis.

   In addition, the proposed TS changes do not significantly affect the availability of equipment or systems required to mitigate the consequences of an accident because (1) extension of the test intervals to the extent requested is not expected to have a significant impact on availability (i.e., no extended test interval would exceed 30 months), and (2) other or more frequent testing performed for the affected systems or components, as well as for redundant systems or components, supports continued availability of the affected functions. The equipment subject to testing per the affected SRs is still required to be operable and capable of performing any accident mitigation functions assumed in the accident analysis. Furthermore, a historical review of surveillance test results identified no failures that would invalidate these conclusions.

   Based on the above, the proposed TS changes do not significantly increase the probability or consequences of an accident previously evaluated.

2. **The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.**

   The proposed TS changes involve a one-time only change in the surveillance testing intervals of selected SRs. Such changes do not introduce any failure mechanisms of

a different type than those previously evaluated since there are no physical changes being made to the facility. In addition, the surveillance test requirements themselves, and the way surveillance tests are performed, will remain unchanged. Therefore, the proposed TS changes do not create the possibility of a new or different kind of accident from any previously evaluated.

3. **The proposed changes do not involve a significant reduction in a margin of safety.**

The one-time extended surveillance frequencies do not result in a significant reduction in the margin of safety. Although the proposed TS changes will result in an increase in the interval between surveillance tests, the impact, if any, on system availability is small. This is because, as noted previously, extension of the test intervals to the limited extent proposed would not be expected to have a significant impact on availability. Other or more frequent testing performed for the affected systems or components, as well as the testing performed for redundant systems or components, supports continued availability of the affected functions.

In addition, the proposed changes do not involve any physical changes to the affected systems or components, nor do they involve any changes to setpoints, operating limits, or safety limits.

Based on the above, the assumptions in the licensing basis are not impacted, and the proposed TS changes do not significantly reduce a margin of safety.

Based on the above evaluations, AmerGen has determined that the proposed amendment does not involve a significant hazards consideration.

ENVIRONMENTAL IMPACT

AmerGen has reviewed the proposed Technical Specification changes against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor significantly change the types or significantly increase the amounts of effluents that may be released offsite. In addition, the proposed changes will reduce occupational radiation exposure and so do not involve a significant increase in individual or cumulative occupational radiation exposures. Based on the foregoing, AmerGen concludes that the proposed Technical Specification changes meet the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement.

MARKED-UP AND PROPOSED NEW/ADDITIONAL TECHNICAL SPECIFICATION PAGES

Insert

TABLE 3.0.2-1 (Continued)
Surveillance Intervals Extended to November 30, 2000

TS SURVEILLANCE REQUIREMENT	DESCRIPTION OF SR REQUIREMENT
3.3.6.1.6. Table 3.3.6.1-1. Item 1.d	Primary Containment and Drywell Isolation. . Main Steam Line Isolation, Condenser Vacuum - Low LOGIC SYSTEM FUNCTIONAL TEST
~~3.3.6.1.6. Table 3.3.6.1-1. Item 2.d~~	~~Primary Containment and Drywell Isolation. Drywell Pressure~~ High (ECCS Divisions 1 and 2) LOGIC SYSTEM FUNCTIONAL TEST
3.3.6.1.6. Table 3.3.6.1-1. Item 2.e	Primary Containment and Drywell Isolation. Reactor Vessel Water Level - Low Low. Level 2 (HPCS NSPS Divisions 3 and 4) LOGIC SYSTEM FUNCTIONAL TEST
3.3.6.1.6. Table 3.3.6.1-1. Item 2.f	Primary Containment and Drywell Isolation. Drywell Pressure - High (HPCS NSPS Divisions 3 and 4) LOGIC SYSTEM FUNCTIONAL TEST
3.3.6.1.6. Table 3.3.6.1-1. Item 2.g	Primary Containment and Drywell Isolation. Containment Building Fuel Transfer Pool Ventilation Plenum Radiation - High LOGIC SYSTEM FUNCTIONAL TEST
3.3.6.1.6. Table 3.3.6.1-1. Item 2.h	Primary Containment and Drywell Isolation. Containment Building Exhaust Radiation - High LOGIC SYSTEM FUNCTIONAL TEST
3.3.6.1.6. Table 3.3.6.1-1. Item 2.i	Primary Containment and Drywell Isolation. Containment Building Continuous Containment Purge Exhaust Radiation - High
3.3.6.1.6. Table 3.3.6.1-1. Item 2.j	Primary Containment and Drywell Isolation. Reactor Vessel Water Level - Low Low Low. Level 1 LOGIC SYSTEM FUNCTIONAL TEST
3.3.6.1.6. Table 3.3.6.1-1. Item 3.b	Primary Containment and Drywell Isolation. RCIC System Isolation. RCIC Steam Line Flow - High Time Delay LOGIC SYSTEM FUNCTIONAL TEST
3.3.6.1.6. Table 3.3.6.1-1. Item 5.d	Primary Containment and Drywell Isolation. RHR System Isolation. Reactor Vessel Water Level - Low Low Low. Level 1 LOGIC SYSTEM FUNCTIONAL TEST
3.3.6.1.6. Table 3.3.6.1-1. Item 5.f	Primary Containment and Drywell Isolation. RHR System Isolation. Drywell Pressure - High LOGIC SYSTEM FUNCTIONAL TEST
3.3.6.2.5. Table 3.3.6.2-1. Item 3	Secondary Containment Isolation. Containment Building Fuel Transfer Pool Ventilation Plenum Exhaust Radiation - High LOGIC SYSTEM FUNCTIONAL TEST
3.3.6.2.5. Table 3.3.6.2-1. Item 4	Secondary Containment Isolation. Containment Building Exhaust Radiation - High LOGIC SYSTEM FUNCTIONAL TEST
3.3.6.2.5. Table 3.3.6.2-1. Item 5	Secondary Containment Isolation. Containment Building Continuous Containment Purge Exhaust Radiation - High LOGIC SYSTEM FUNCTIONAL TEST
3.3.6.2.5. Table 3.3.6.2-1. Item 6	Secondary Containment Isolation. Fuel Building Exhaust Radiation - High LOGIC SYSTEM FUNCTIONAL TEST
3.3.6.3.4. Table 3.3.6.3-1. Item 4	RHR Containment Spray System. Timers. System A and System B CHANNEL CALIBRATION
3.3.6.3.4. Table 3.3.6.3-1. Item 5	RHR Containment Spray System. Timers. System B Only CHANNEL CALIBRATION
3.3.6.3.5. Table 3.3.6.3-1. Item 1	RHR Containment Spray System. Drywell Pressure - High LOGIC SYSTEM FUNCTIONAL TEST
3.3.6.3.5. Table 3.3.6.3-1. Item 2	RHR Containment Spray System. Containment Pressure - High LOGIC SYSTEM FUNCTIONAL TEST
3.3.6.3.5. Table 3.3.6.3-1. Item 3	RHR Containment Spray System. Reactor Vessel Water Level - Low Low Low. Level 1 LOGIC SYSTEM FUNCTIONAL TEST
3.3.6.3.5. Table 3.3.6.3-1. Item 4	RHR Containment Spray System. Timers. System A and System B LOGIC SYSTEM FUNCTIONAL TEST

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Amendment

Insert

TABLE 3.0.2-1 (Continued)
Surveillance Intervals Extended to November 30, 2000

TS SURVEILLANCE REQUIREMENT	DESCRIPTION OF SR REQUIREMENT
3.3.6.3.5. Table 3.3.6.3-1. Item 5	RHR Containment Spray System. Timers. System B Only LOGIC SYSTEM FUNCTIONAL TEST
3.3.6.3.5. Table 3.3.6.3-1. Item 6	RHR Containment Spray System. Manual Initiation LOGIC SYSTEM FUNCTIONAL TEST
3.3.8.1.3. Table 3.3.8.1-1. Item 1.a	Loss of Power. Divisions 1 and 2 - 4.16 kV Emergency Bus Undervoltage. Loss of Voltage - 4.16 kV basis CHANNEL CALIBRATION
3.3.8.1.3. Table 3.3.8.1-1. Item 1.b	Loss of Power. Divisions 1 and 2 - 4.16 kV Emergency Bus Undervoltage. Loss of Voltage - Time Delay CHANNEL CALIBRATION
3.3.8.1.3. Table 3.3.8.1-1. Item 1.c	Loss of Power. Divisions 1 and 2 - 4.16 kV Emergency Bus Undervoltage. Degraded Voltage Reset - 4.16 kV basis CHANNEL CALIBRATION
3.3.8.1.3. Table 3.3.8.1-1. Item 1.d	Loss of Power. Divisions 1 and 2 - 4.16 kV Emergency Bus Undervoltage. Degraded Voltage Drop-out - 4.16 kV basis CHANNEL CALIBRATION
3.3.8.1.3. Table 3.3.8.1-1. Item 1.e	Loss of Power. Divisions 1 and 2 - 4.16 kV Emergency Bus Undervoltage. Degraded Voltage - Time Delay CHANNEL CALIBRATION
3.3.8.1.3. Table 3.3.8.1-1. Item 2.a	Loss of Power. Division 3 - 4.16 kV Emergency Bus Undervoltage. Loss of Voltage - 4.16 kV basis CHANNEL CALIBRATION
3.3.8.1.3. Table 3.3.8.1-1. Item 2.b	Loss of Power. Division 3 - 4.16 kV Emergency Bus Undervoltage. Loss of Voltage - Time Delay CHANNEL CALIBRATION
3.3.8.1.4. Table 3.3.8.1-1. Item 1.a	Loss of Power. Divisions 1 and 2 - 4.16 kV Emergency Bus Undervoltage. Loss of Voltage - 4.16 kV basis LOGIC SYSTEM FUNCTIONAL TEST
3.3.8.1.4. Table 3.3.8.1-1. Item 1.b	Loss of Power. Divisions 1 and 2 - 4.16 kV Emergency Bus Undervoltage. Loss of Voltage - Time Delay LOGIC SYSTEM FUNCTIONAL TEST
3.3.8.1.4. Table 3.3.8.1-1. Item 1.c	Loss of Power. Divisions 1 and 2 - 4.16 kV Emergency Bus Undervoltage. Degraded Voltage Reset - 4.16 kV basis LOGIC SYSTEM FUNCTIONAL TEST
3.3.8.1.4. Table 3.3.8.1-1. Item 1.d	Loss of Power. Divisions 1 and 2 - 4.16 kV Emergency Bus Undervoltage. Degraded Voltage Drop-out - 4.16 kV basis LOGIC SYSTEM FUNCTIONAL TEST
3.3.8.1.4. Table 3.3.8.1-1. Item 1.e	Loss of Power. Divisions 1 and 2 - 4.16 kV Emergency Bus Undervoltage. Degraded Voltage - Time Delay LOGIC SYSTEM FUNCTIONAL TEST
3.3.8.1.4. Table 3.3.8.1-1. Item 2.a	Loss of Power. Division 3 - 4.16 kV Emergency Bus Undervoltage. Loss of Voltage - 4.16 kV basis LOGIC SYSTEM FUNCTIONAL TEST
3.3.8.1.4. Table 3.3.8.1-1. Item 2.b	Loss of Power. Division 3 - 4.16 kV Emergency Bus Undervoltage. Loss of Voltage - Time Delay LOGIC SYSTEM FUNCTIONAL TEST
3.3.8.1.4. Table 3.3.8.1-1. Item 2.c	Loss of Power. Division 3 - 4.16 kV Emergency Bus Undervoltage. Degraded Voltage Reset - 4.16 kV basis LOGIC SYSTEM FUNCTIONAL TEST
3.3.8.1.4. Table 3.3.8.1-1. Item 2.d	Loss of Power. Division 3 - 4.16 kV Emergency Bus Undervoltage. Degraded Voltage Drop-out - 4.16 kV basis LOGIC SYSTEM FUNCTIONAL TEST
3.3.8.1.4. Table 3.3.8.1-1. Item 2.e	Loss of Power. Division 3 - 4.16 kV Emergency Bus Undervoltage. Degraded Voltage - Time Delay LOGIC SYSTEM FUNCTIONAL TEST

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Amendment

Inserts to Table SR 3.0.2-1

[page 3.0-8]

TS SURVEILLANCE REQUIREMENT	DESCRIPTION OF SR REQUIREMENT
3.3.6.1.6, Table 3.3.6.1-1, Item 2.a	Primary Containment and Drywell Isolation, Reactor Vessel Water Level - Low Low, Level 2, LOGIC SYSTEM FUNCTIONAL TEST

[page 3.0-9]

TS SURVEILLANCE REQUIREMENT	DESCRIPTION OF SR REQUIREMENT
3.3.6.4.7, Table 3.3.6.4-1, Item 1	Suppression Pool Makeup System, Drywell Pressure - High, LOGIC SYSTEM FUNCTIONAL TEST
3.3.6.4.7, Table 3.3.6.4-1, Item 2	Suppression Pool Makeup System, Reactor Vessel Water Level - Low Low Low, Level 1, LOGIC SYSTEM FUNCTIONAL TEST
3.3.6.4.7, Table 3.3.6.4-1, Item 3	Suppression Pool Makeup System, Suppression Pool Water Level- Low Low, LOGIC SYSTEM FUNCTIONAL TEST
3.3.6.4.7, Table 3.3.6.4-1, Item 4	Suppression Pool Makeup System, Timer, LOGIC SYSTEM FUNCTIONAL TEST
3.3.6.4.7, Table 3.3.6.4-1, Item 5	Suppression Pool Makeup System, Manual Initiation, LOGIC SYSTEM FUNCTIONAL TEST