

April 3, 1990

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Docket No. 50-461

Mr. Frank A. Spangenberg
Manager - Licensing and Safety
Clinton Power Station
P. O. Box 678
Mail Code V920
Clinton, Illinois 61727

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Dear Mr. Spangenberg:

SUBJECT: TECHNICAL SPECIFICATION CHANGE REQUEST TO REVISE THE ADMINISTRATIVE CONTROLS SECTION INCLUDING DELETION OF THE ORGANIZATIONAL CHARTS FOR CLINTON POWER STATION UNIT 1 (TAC NOS. 72099, 72101 & 73814)

The Commission has issued the enclosed Amendment No. ³⁴ to Facility Operating License No. NPF-62 for the Clinton Power Station, Unit No. 1. This amendment consists of changes to the Technical Specifications (TSs) in response to your applications dated December 21, 1988 and June 30, 1989.

This amendment to the Administrative Controls section of the Clinton Power Station Technical Specifications deletes the organizational charts, revises the review authority for Technical Specification required procedures, and changes the Facility Review Group composition.

A copy of our Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

151

John B. Hickman, Project Manager
Project Directorate III-2
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

- Amendment No. 34 to License No. NPF-62
- Safety Evaluation

cc w/enclosures:
See next page

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Document Name: AMENDMENT 72099/72101/73814

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

April 3, 1990

Docket No. 50-461

Mr. Frank A. Spangenberg
Manager - Licensing and Safety
Clinton Power Station
P. O. Box 678
Mail Code V920
Clinton, Illinois 61727

Dear Mr. Spangenberg:

SUBJECT: TECHNICAL SPECIFICATION CHANGE REQUEST TO REVISE THE ADMINISTRATIVE CONTROLS SECTION INCLUDING DELETION OF THE ORGANIZATIONAL CHARTS FOR CLINTON POWER STATION UNIT 1 (TAC NOS. 72099, 72101 & 73814)

The Commission has issued the enclosed Amendment No. 34 to Facility Operating License No. NPF-62 for the Clinton Power Station, Unit No. 1. This amendment consists of changes to the Technical Specifications (TSs) in response to your applications dated December 21, 1988 and June 30, 1989.

This amendment to the Administrative Controls Section of the Clinton Power Station Technical Specifications deletes the organizational charts, revises the review authority for Technical Specification required procedures, and changes the Facility Review Group composition.

A copy of our Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

A handwritten signature in cursive script, reading "John B. Hickman".

John B. Hickman, Project Manager
Project Directorate III-2
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 34 to License No. NPF-62
2. Safety Evaluation

cc w/enclosures:
See next page

Mr. Frank A. Spangenberg
Illinois Power Company

Clinton Power Station
Unit 1

cc:

Mr. J. S. Perry
Vice President
Clinton Power Station
P. O. Box 678
Clinton, Illinois, 61727

Illinois Department
of Nuclear Safety
Office of Nuclear Facility Safety
1035 Outer Park Drive
Springfield, Illinois 62704

Mr. R. D. Freeman
Manager-Nuclear Station Engineering Dept.
Clinton Power Station
P. O. Box 678
Clinton, Illinois 61727

Mr. Donald Schopfer
Project Manager
Sargent & Lundy Engineers
55 East Monroe Street
Chicago, Illinois 60603

Sheldon Zabel, Esquire
Schiff, Hardin & Waite
7200 Sears Tower
233 Wacker Drive
Chicago, Illinois 60606

Clinton Resident Inspector
U. S. Nuclear Regulatory Commission
RR#3, Box 229 A
Clinton Illinois 61727

Mr. L. Larson
Project Manager
General Electric Company
175 Curtner Avenue, N/C 395
San Jose, California 95125

Regional Administrator, Region III
799 Roosevelt Road, Bldg. #4
Glen Ellyn, Illinois 60137

Chairman of DeWitt County
c/o County Clerk's Office
DeWitt County Courthouse
Clinton, Illinois 61727



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

ILLINOIS POWER COMPANY, ET AL.

DOCKET NO. 50-461

CLINTON POWER STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 34
License No. NPF-62

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The applications for amendment by Illinois Power Company* (IP), Soyland Power Cooperative, Inc. (the licensees) dated December 21, 1988 and June 30, 1989, comply with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-62 is hereby amended to read as follows:

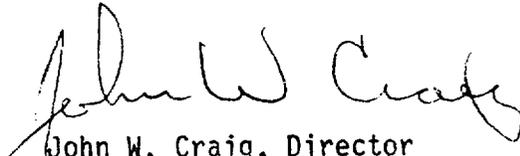
*Illinois Power Company is authorized to act as agent for Soyland Power Cooperative, Inc. and has exclusive responsibility and control over the physical construction, operation and maintenance of the facility.

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 34 , are hereby incorporated into this license. Illinois Power Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



John W. Craig, Director
Project Directorate III-2
Division of Reactor Projects - III,
IV, V and Special Projects

Attachment:
Changes to the Technical
Specifications

Date of Issuance: April 3, 1990

ATTACHMENT TO LICENSE AMENDMENT NO. 34

FACILITY OPERATING LICENSE NO. NPF-62

DOCKET NO. 50-461

Replace the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain vertical lines indicating the area of change.

<u>Remove</u>	<u>Insert</u>
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----	6-1a
6-3	6-3
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6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Manager - Clinton Power Station shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Shift Supervisor or during his absence from the control room, a designated individual shall be responsible for the control room command function. A management directive to this effect, signed by the Vice President-Nuclear shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the CPS Updated Safety Analysis Report (USAR).
- b. The Manager - Clinton Power Station shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Vice President - Nuclear shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out radiation protection and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.0 ADMINISTRATIVE CONTROLS

6.2.2 UNIT STAFF

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.2-1;
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in OPERATIONAL CONDITION 1, 2 or 3, at least one licensed Senior Operator shall be in the control room;
- c. A Radiation Protection Technician* shall be on site when fuel is in the reactor;
- d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation;
- e. A site fire brigade of at least five members shall be maintained on site at all times*. The fire brigade shall not include the Shift Supervisor, the Shift Technical Advisor, nor the two other members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency; and

*The Radiation Protection Technician and fire brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.



Figure 6.2.1-1 DELETED



Figure 6.2.2-1 DELETED

ADMINISTRATIVE CONTROLS

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 except for the Director - Plant Radiation Protection who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. The Director - Plant Operations shall have held an SRO license for Clinton Power Station; the Supervisor - Plant Operations shall hold an SRO license for Clinton Power Station.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Director - Nuclear Training and shall meet or exceed the requirements of 10 CFR Part 55.

6.5 REVIEW AND AUDIT

6.5.1 FACILITY REVIEW GROUP (FRG)

FUNCTION

6.5.1.1 The FRG shall function to advise the Manager - Clinton Power Station on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The FRG shall be composed of a chairman and supervisory (supervisor or higher) members collectively having the experience and competence in areas of plant operations, maintenance (control and instrumentation, electrical maintenance, mechanical maintenance), radiation protection, chemistry and nuclear engineering, necessary to perform the required review function.

ADMINISTRATIVE CONTROLS

AUTHORITY

6.5.2.9 The NRAG shall report to and advise the Vice President on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

RECORDS

6.5.2.10 Records of NRAG activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each NRAG meeting shall be prepared, approved, and forwarded to the Vice President within 14 days following each meeting.
- b. Reports of reviews encompassed by Specification 6.5.2.7 shall be prepared, approved, and forwarded to the Vice President within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.2.8 shall be forwarded to the Vice President and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

6.5.3 TECHNICAL REVIEW AND CONTROL

ACTIVITIES

Procedures required by Technical Specification 6.8 and other procedures which affect plant nuclear safety as determined by the Manager - Clinton Power Station or the responsible manager* and changes thereto, other than editorial or typographical changes, shall be reviewed as follows:

6.5.3.1 TECHNICAL REVIEW

- a. Each such procedure or procedure change shall be independently reviewed by an individual knowledgeable in the area affected other than the individual who prepared the procedure, or procedure change. The Manager - Clinton Power Station or the responsible manager* shall prior to implementation approve all plant procedures and changes thereto.
- b. Individuals responsible for reviews performed in accordance with Item 6.5.3.1a. above shall be designated by the Manager - Clinton Power Station or the responsible manager*. Each such review shall include a determination of whether or not additional, cross-disciplinary, review is necessary. If deemed necessary, such review shall be performed by the review personnel of the appropriate discipline.

Individuals performing these reviews shall meet or exceed the qualifications stated in ANSI/ANS 3.1-1978 for the appropriate discipline.

*The responsible manager must be the equivalent of the Manager - Clinton Power Station with respect to his/her level of responsibility within the corporate structure.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 34 TO FACILITY OPERATING LICENSE NO. NPF-62
CLINTON POWER STATION, UNIT NO. 1
ILLINOIS POWER COMPANY, ET AL.
DOCKET NO. 50-461

1.0 INTRODUCTION

By letters dated December 21, 1988 and June 30, 1989, the Illinois Power Company (IP), et al. (the licensees) requested amendments to Facility Operating License No. NPF-62 for the Clinton Power Station, Unit 1. The first proposed amendment would delete the onsite and offsite organizational charts from the Administrative Controls Section of the Technical Specifications (TS) and revise titles for certain personnel in the onsite organization. The proposed deletion of the organizational charts was submitted in accordance with the guidance provided in NRC Generic Letter 88-06. The second proposed change would revise the designated manager responsible for technical review of procedures as specified in Section 6.5.3 of the Technical Specifications. The last proposed change would revise the description of the Facility Review Group (FRG) in Section 6.5.1 of the Technical Specifications.

2.0 EVALUATION

Consistent with the guidance provided in the Standard Technical Specifications, Specifications 6.2.1 and 6.2.2 of the administrative control requirements have referenced offsite and unit (onsite) organizational charts that are provided as figures to these sections. On a plant specific basis, these organizational charts have been provided by applicants and included in the TS issued with the operating license. Subsequent restructuring of either the offsite or unit organizations, following the issuance of an operating license, has required licensees to submit a license amendment for NRC approval to reflect the desired changes in these organizations. As a consequence, organizational changes have necessitated the need to request an amendment of the operating license.

Because of these limitations on organizational structure, the nuclear industry has highlighted this as an area for improvement in the TS. The Shearon Harris licensee proposed changes to remove organizational charts from its TS under the lead-plant concept that included the endorsement of the proposed changes by the Westinghouse Owners Group. In its review of the Shearon Harris proposal, the staff concluded that most of the essential elements of offsite and onsite organizational charts are captured by other regulatory requirements, notably, Appendix B to 10 CFR Part 50. However, there were aspects of the organizational

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structure that are important to ensure that the administrative control requirements of 10 CFR 50.36 would be met and that would not be retained with the removal of the organizational charts. The applicable regulatory requirements are those administrative controls that are necessary to ensure safe operation of the facility. Therefore, those aspects of organizational charts for Shearon Harris that were essential for conformance with regulatory requirements were added (1) to Specification 6.2.1 to define functional requirements for the offsite and onsite organizations and (2) to Specification 6.2.2 to define qualification requirements of the unit staff.

By letter dated January 27, 1988, the staff issued Amendment No. 3 to Facility Operating License NFP-63 for the Shearon Harris Nuclear Power Plant that incorporated these changes to their TS. Subsequently the staff developed guidance on an acceptable format for license amendment requests to remove the organizational charts from the TS. Generic Letter 88-06 provided this guidance to all power reactors.

3.0 EVALUATION

The licensee's first proposed change to remove the organizational charts from the Technical Specifications is in accordance with the guidance provided by Generic Letter 88-06 and addressed the items listed below.

- (1) Specifications 6.2.1 and 6.2.2 were revised to delete the references to Figures 6.2-1 and 6.2-2 that were removed from the TS.
- (2) Functional requirements of the offsite and onsite organizations were defined and added to Specification 6.2.1, and they are consistent with the guidance provided in Generic Letter 88-06. The specification notes that implementation of these requirements is documented in the Clinton Power Station Updated Safety Analysis Report (USAR).
- (3) The senior reactor operator and reactor operator license qualified positions of the unit staff were added to Specification 6.3.1. Therefore, this requirement that was identified on the organizational chart for the unit staff will be retained.
- (4) Consistent with requirements to document the offsite and onsite organization relationships in the form of organizational charts, this documentation currently exists in the USAR.

On the basis of its review of the above items, the staff concludes that the licensee has provided an acceptable response to these items as addressed in the NRC guidance on removing organizational charts from the administrative control requirements of the TS. The staff finds that these changes are consistent with the staff's generic finding on the acceptability of such changes as noted in Generic Letter 88-06. The proposed change is considered acceptable by the staff. The title changes that were included in the first proposed change are superseded by the change to the FRG description requested in the third proposed change, discussed below, and are therefore considered to be withdrawn.

The licensee's second proposed change is intended to provide consistency between the technical review authority and the approval authority for procedures required by the Technical Specifications. The review and approval

authority for procedures described in 6.8.2 and 6.8.3.c was previously revised to include approval by a responsible manager other than the Manager - Clinton Power Station. This was done since not all procedures are Plant Staff procedures. Some procedures are associated with support organizations or programs for which managers other than the Plant Manager are directly responsible. This change revises the authority for technical review of procedures to be consistent with the approval authority. The proposed change also has the caveat that the "responsible manager" will have an equivalent responsibility to the Manager - Clinton Power Station within the corporate structure. The licensee has committed that designated technical reviewers will still be required to meet the qualification requirements of ANS/ANSI 3.1-1978. The proposed change is administrative in nature and is considered acceptable by the staff.

The licensee's third change revises the description of the FRG to replace the specific title designations with a description of the requirements of the members. This change is to allow future changes to plant staff organization or titles without necessitating a Technical Specification change. As in the first change which proposed to delete the organizational charts, this change provides for appropriate technical qualifications of the positions while allowing the licensee reasonable administrative control over the individual delegations. The proposed change is considered acceptable by the staff.

4.0 ENVIRONMENTAL CONSIDERATION

These amendments relate to changes in recordkeeping, or administrative procedures or requirements. The Commission has previously issued a proposed finding that these amendments involve no significant-hazards consideration and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement nor environmental assessment need be prepared in connection with the issuance of these amendments.

5.0 CONCLUSION

The Commission made proposed determinations that the amendments involve no significant-hazards consideration, which were published in the Federal Register (55 FR 6105) on February 21, 1990.

The proposed amendment to the Administrative Controls Section of the Clinton Power Station Technical Specifications to delete the organizational charts, revise the review authority for Technical Specification required procedures, and change the FRG composition has been reviewed by the NRC staff and found to be acceptable. The NRC staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of this amendment will not be inimical to the common defense and the security nor to the health and safety of the public.

Principal Contributor: Thomas G. Dunning, OTSB/DOEA
John B. Hickman, NRR/PDIII-2

Dated: April 3, 1990