

August 30, 1988

Docket No.: 50-461

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

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Docket file
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Dear Mr. Spangenberg:

SUBJECT: ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT -
TECHNICAL SPECIFICATION CHANGES CONCERNING THE PROCESS AND EFFLUENT
RADIATION MONITORING (TAC NO. 66553)

RE: CLINTON POWER STATION, UNIT 1

Pursuant to 10 CFR 51.119, the Commission has requested the Office of the Federal Register to publish the enclosed "Environmental Assessment and Finding of No Significant Impact." This notice is in regard to your request dated October 30, 1987 for changes to the Technical Specifications (TSs) concerning the process and effluent radiation monitoring systems.

Janice A. Stevens, Project Manager
Project Directorate III-2
Division of Reactor Projects - III,
IV, V and Special Projects

Enclosure:
As stated

cc: w/enclosure:
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NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555
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UNITED STATES NUCLEAR REGULATORY COMMISSIONILLINOIS POWER COMPANY, ET AL.DOCKET NO. 50-461ENVIRONMENTAL ASSESSMENT AND FINDING OFNO SIGNIFICANT IMPACT

The U. S. Nuclear Regulatory Commission (the Commission) is considering issuance of an amendment to the Illinois Power Company* (IP), Soyland Power Cooperative, Inc. and Western Illinois Power Cooperative, Inc., (the licensees) for Clinton Power Station, Unit 1, located in DeWitt County, Illinois.

ENVIRONMENTAL ASSESSMENTIdentification of Proposed Action:

In general, the proposed license amendment would revise the Technical Specifications (TS) related to the process and effluent radiation monitoring systems.

Specifically, the licensees requested the proposed changes to account and allow credit to be taken for the redundancy of the common Central Control Terminals (CCTs), where process and effluent radiation monitor status and indications are provided, and to clarify certain testing and surveillance requirements for process and effluent radiation monitors based on as-built capabilities and features provided in these systems.

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

This revision to the Clinton Power Station license would be made in response to the licensees' application for amendment dated October 30, 1987.

The Need for the Proposed Action:

Pursuant to 10 CFR 50.90, IP, et al. have proposed an amendment to Facility Operating License No. NPF-62 which consists of four changes to the TS concerning the process and effluent radiation monitoring systems.

The first change consists of various revisions to account and allow credit to be taken for redundancy of the common Central Control Terminals (CCTs) where process radiation monitor status and indications are provided. One revision is proposed to include the CCTs in the OPERABILITY requirements for certain radiation monitor channels required to be OPERABLE by the Technical Specifications. A revision to the ACTIONS is proposed, as applicable, to account for inoperability of the CCTs versus inoperability of the monitor itself that provides input to the CCTs. A revision is proposed to the CHANNEL CHECK for the applicable radiation monitors to ensure that channel communication is established to the Main Control Room-CCT or Radiation Protection-CCT. A revision is also proposed to the expanded CHANNEL FUNCTIONAL TEST requirements for the radiation monitors to make the wording of the requirement based on the Standard Technical Specifications more specific and applicable to the Clinton design without changing the intent of the requirement.

The second change consists of a revision to the CHANNEL FUNCTIONAL TEST requirement for the liquid radwaste discharge monitor. The current requirement requires a demonstration of automatic isolation of the release pathway with the

monitor controls not set in the OPERATE mode. The change would delete this specific requirement since the monitor is not designed to effect an isolation for this specific condition.

The third change consists of specific revisions in order to make the channel/instrument descriptions for the Standby Gas Treatment System (SGTS) Exhaust Process Radiation Monitor (PRM) agree with the HVAC Exhaust PRM descriptions since they are designed and operated in a similar manner.

The fourth change consists of several changes to ACTION 72 of Table 3.3.7.1-1 in order to make the ACTION consistent with other applicable Specifications including other ACTIONS. To support those changes related to OPERABILITY of the Pre-Treatment Off-Gas process radiation monitor, changes to Specifications 4.11.2.7.1 and 4.11.2.7.2 are also proposed.

Environmental Impacts of the Proposed Action:

The changes proposed apply to Technical Specifications 3/4.3.7.1 (along with 4.11.2.7.1 and 4.11.2.7.2), 3/4.3.7.11, and 3/4.3.7.12. The change to Table 3/4.3.7.1-1 (Radiation Monitoring Instrumentation), Table 3/4.3.7.11-1 (Radioactive Liquid Effluent Monitoring Instrumentation), and Table 3/4.3.7.12-1 (Radioactive Gaseous Effluent Monitoring Instrumentation) are as follows:

The process radiation monitors at Clinton provide their operational information via data links to two common CCTs. The radiation monitor indication and status are provided through either of the CCTs. One CCT is located in the Main Control Room (MCR) and the other CCT is located in the Radiation Protection Office (RPO). The licensees stated in their letter dated

October 30, 1987 that the RPO is continuously manned (24 hours a day) with telephone lines to the MCR and that these two CCTs are functionally equivalent. The staff considered in its evaluation that they are redundant CCTs with respect to verifying monitor status, checking monitor indications, and performing required surveillances on the radiation monitors.

The channel functional tests specified for certain monitors in the above tables require, among other things, the capability to remotely annunciate an alarm condition in the MCR. Since the CCT in the MCR (CCT-MCR) is considered to be functionally equivalent to the CCT in the RPO (CCT-RPO), a new note is affixed to Table 3.3.7.1-1 as Note (b) and to Tables 3.3.7.11-1 and 3.3.7.12-1 as Note (a). This new note is added to include in the channel functional tests the capability of either the CCT-MCR or CCT-RPO to provide the alarm status of the applicable radiation monitor channels, rather than referring only to the MCR annunciation as currently specified in the Clinton TS. Inoperability of one CCT does not constitute inoperability of a monitor since the redundant CCT can provide the required status, indication, and alarm for applicable radiation monitors. Therefore, the staff finds the additions to the above tables to be acceptable.

Actions 72 and 73 for Table 3.3.7.1-1, Action 111 for table 3.3.7.11-1, and Action 121 for Table 3.3.7.12-1 are extended to include the operability requirements for both CCTs in the event that both CCTs are inoperable and are therefore incapable of providing the required remote alarm annunciation. Since these changes to the action statements do not remove or relax any existing requirements but add the new requirements, the staff finds the extended action statements to be acceptable.

The licensees proposed a revised Table Notation (1) to Table 4.3.7.1-1 (Radioactive Liquid Effluent Monitoring Instrumentation Surveillance Requirements) to reflect the as-built capabilities and design features provided in the liquid effluent radiation monitors. The current Clinton TS (Item 4 in Table Notation 1) states that automatic isolation of liquid effluent is to occur with "Instrument Controls not set in Operate Mode." The licensees' proposed change clarifies this item to read "Instrument Control not set in Normal Operate Mode (uninitialized, calibrate, maintenance, or standby)." The discrepancy between specific system design features and the current Clinton TS is due to an oversight at the time the Clinton TS was drafted. This change does not remove or relax the currently existing requirements but clarifies the requirement to reflect the specific design features. Therefore, the staff finds this change to be acceptable.

The changes proposed for Tables 3.3.7.12-1 (Radioactive Gaseous Effluent Monitoring Instrumentation) and 4.3.7.12-1 (Radioactive Gaseous Effluent Monitoring Instrumentation Surveillance Requirements) are editorial in nature and are to provide consistent nomenclature for the station heating, ventilation, and air conditioning (HVAC) exhaust process radiation monitor (PRM) and the standby gas treatment system exhaust PRM. The staff finds the changes to be acceptable.

Action Statement 72 for Pre-Treatment Off-Gas PRM in Table 3.3.7.1-1 (Radiation Monitoring Instrumentation) currently states that "...gases from the main condenser off-gas treatment system may be released to the environment for up to 72 hours provided..." This Action Statement is not specific as to what

actions should be taken after the 72-hour limit since the limiting condition for operation (LCO) in the same section also specifies that the provision of Specifications 3.0.3 and 3.0.4 are not applicable. Thus, no further action (reactor shutdown) is required if the 72-hour limit is exceeded. To rectify this discrepancy, the licensees proposed to delete the 72-hour limit requirement and instead to insert a new provision (3) stating "Grab samples are taken at least once per 8 hours and analyzed for gross noble gas activity within 4 hours..." (until this monitor becomes operational). In addition to this monitor, there is a downstream detector (plant effluent monitor) which monitors the gaseous radioactive effluent through the pre-treatment off-gas monitor to the environment. Therefore, the staff finds the licensees' proposed changes to be acceptable.

As a direct result of this change, a phrase is added to Surveillance Sections 4.11.2.7.1 and 4.11.2.7.2: "...required to be operable as otherwise provided by Table 3.3.7.1". This addition provides consistency with the operational requirements of the pre-treatment off-gas process radiation monitor.

The Commission has determined that potential radiological releases during normal operations, transients, and for accidents would not be increased. With regard to non-radiological impacts, the proposed amendment involves systems located entirely within the restricted area as defined in 10 CFR Part 20. They do not affect non-radiological plant effluents and have no other environmental impact. Therefore, the staff also concludes that there are no significant non-radiological environmental impacts associated with the proposed amendment.

Accordingly, the Commission findings in the "Final Environmental Statement related to the operation of Clinton Power Station, Unit No. 1" dated May 1982 regarding radiological environmental impacts from the plant during normal operation or after accident conditions, are not adversely altered by this action. IP is committed to operate Clinton, Unit 1 in accordance with standards and regulations to maintain occupational exposure levels "as low as reasonably achievable."

Alternative to the Proposed Actions:

The principal alternative would be to deny the requested amendment. This alternative, in effect, would be the same as a "no action" alternative. Since the Commission has concluded that no adverse environmental effects are associated with this proposed action, any alternative with equal or greater environmental impact need not be evaluated.

Alternative Use of Resources:

This action does not involve the use of resources not previously considered in connection with the Nuclear Regulatory Commission's Final Environmental Statement dated May 1982 related to this facility.

Agencies and Persons Consulted:

The NRC staff reviewed the licensees' request of October 30, 1987 and did not consult other agencies or persons.

FINDING OF NO SIGNIFICANT IMPACT:

The Commission has determined not to prepare an environmental impact statement of the proposed license amendment.

Based upon this environmental assessment, the Commission concludes that the proposed action will not have a significant adverse effect on the quality of the human environment.

For further details with respect to this action, see the request for amendment dated October 30, 1987 and the Final Environmental Statement for the Clinton Power Station dated May 1982, which are available for public inspection at the Commission Public Document Room, 1717 H Street, N.W., Washington, D.C. 20555 and at the Vespasian Warner, 120 West Johnson Street, Clinton, Illinois 61727.

Dated at Rockville, Maryland this 30th day of August 1988.

FOR THE NUCLEAR REGULATORY COMMISSION



Daniel R. Muller, Director
Project Directorate III-2
Division of Reactor Projects - III,
IV, V and Special Projects