

March 9, 1995

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Mr. Richard F. Phares
Director - Licensing
Clinton Power Station
P. O. Box 678
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Dear Mr. Phares:

SUBJECT: ISSUANCE OF AMENDMENT NO. 98 TO FACILITY OPERATING LICENSE NO.
NPF-62 - CLINTON POWER STATION, UNIT 1 (TAC NO. M91387)

Dear Mr. Phares:

The U. S. Nuclear Regulatory Commission (Commission) has issued the enclosed Amendment No. 98 to Facility Operating License No. NPF-62 for the Clinton Power Station, Unit No. 1. The amendment is in response to your application dated January 27, 1995 (U-602376).

The amendment modifies the technical specifications (TSs) to eliminate selected response time testing requirements as described in the Boiling Water Reactor Owners' Group topical report, NEDO-32291, "System Analyses for Elimination of Selected Response Time Testing Requirements." The affected TSs are TS 3.3.1.1, "Reactor Protection System (RPS) Instrumentation," TS 3.3.5.1, "Emergency Core Cooling System (ECCS) Instrumentation," TS 3.3.6.1, "Primary Containment and Drywell Isolation Instrumentation," and TS 3.5.1, "ECCS - Operating."

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

Sincerely,

Original signed by Douglas V. Pickett

Douglas V. Pickett, Senior Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-461

Enclosures: 1. Amendment No. 98 to NPF-62
2. Safety Evaluation

cc w/encls: see next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 9, 1995

Mr. Richard F. Phares
Director - Licensing
Clinton Power Station
P. O. Box 678
Mail Code V920
Clinton, IL 61727

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

Sincerely,

A handwritten signature in cursive script that reads "Douglas V. Pickett".

Douglas V. Pickett, Senior Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-461

Enclosures: 1. Amendment No. 98 to NPF-62
2. Safety Evaluation

cc w/encls: See next page

Mr. Richard F. Phares
Illinois Power Company

Clinton Power Station
Unit No. 1

cc:

Mr. John Cook
Vice President
Clinton Power Station
Post Office Box 678
Clinton, Illinois 61727

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

Mr. J. A. Miller
Manager Nuclear Station
Engineering Department
Clinton Power Station
Post Office Box 678
Clinton, Illinois 61727

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

Mr. R. T. Hill
Licensing Services Manager
General Electric Company
175 Curtner Avenue, M/C 481
San Jose, California 95125

Regional Administrator, Region III
801 Warrenville Road
Lisle, Illinois 60532-4351

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

Mr. Robert Neumann
Office of Public Counsel
State of Illinois Center
100 W. Randolph, Suite 11-300
Chicago, Illinois 60601

Mr. J. W. Blattner
Project Manager
Sargent & Lundy Engineers
55 East Monroe Street
Chicago, Illinois 60603



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

ILLINOIS POWER COMPANY, ET AL.

DOCKET NO. 50-461

CLINTON POWER STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 98
License No. NPF-62

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Illinois Power Company* (IP), and Soyland Power Cooperative, Inc. (the licensees) dated January 27, 1995, complies 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:

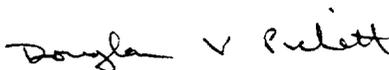
*Illinois Power Company is authorized to act as agent for Soyland Power Cooperative, Inc. and has exclusive responsibility and control over the physical construction, operation and maintenance of the facility.

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 98, 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



Douglas V. Pickett, Senior Project Manager
Project Directorate III-3
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: March 9, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 98

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.

Remove Pages

3.3-6
3.3-38
3.3-39
3.3-40
3.3-41
3.3-54
3.5-5

Insert Pages

3.3-6
3.3-38
3.3-39
3.3-40
3.3-41
3.3-54
3.5-5

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.3.1.1.16 Verify Turbine Stop Valve Closure and Turbine Control Valve Fast Closure Trip Oil Pressure-Low Functions are not bypassed when THERMAL POWER is \geq 40% RTP.	18 months
SR 3.3.1.1.17 -----NOTES----- 1. Neutron detectors are excluded. 2. For Functions 3, 4, and 5 in Table 3.3.1.1-1, the channel sensors are excluded. 3. The STAGGERED TEST BASIS Frequency for each Function shall be determined on a per channel basis. ----- Verify the RPS RESPONSE TIME is within limits.	18 months on a STAGGERED TEST BASIS

SURVEILLANCE REQUIREMENTS

-----NOTES-----

1. Refer to Table 3.3.5.1-1 to determine which SRs apply for each ECCS Function.
 2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed as follows: (a) for up to 6 hours for Functions 3.c, 3.f, 3.g, and 3.h; and (b) for up to 6 hours for Functions other than 3.c, 3.f, 3.g, and 3.h, provided the associated Function or the redundant Function maintains ECCS initiation capability.
-

SURVEILLANCE	FREQUENCY
SR 3.3.5.1.1 Perform CHANNEL CHECK.	12 hours
SR 3.3.5.1.2 Perform CHANNEL FUNCTIONAL TEST.	92 days
SR 3.3.5.1.3 Calibrate the analog trip module.	92 days
SR 3.3.5.1.4 Perform CHANNEL CALIBRATION.	18 months
SR 3.3.5.1.5 Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months

Table 3.3.5.1-1 (page 1 of 5)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Low Pressure Coolant Injection-A (LPCI) and Low Pressure Core Spray (LPCS) Subsystems					
a. Reactor Vessel Water Level - Low Low Low, Level 1	1,2,3, 4(a),5(a)	2 ^(b)	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ -147.7 inches
b. Drywell Pressure - High	1,2,3	2 ^(b)	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 1.88 psig
c. LPCI Pump A Start - Time Delay Logic Card	1,2,3, 4(a),5(a)	1	C	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 4.5 seconds and ≤ 5.5 seconds
d. Reactor Vessel Pressure - Low (Injection Permissive)	1,2,3	4	C	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 452 psig and ≤ 478 psig
	4(a),5(a)	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 452 psig and ≤ 478 psig
e. LPCS Pump Discharge Flow - Low (Bypass)	1,2,3, 4(a),5(a)	1	E	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 750 gpm
f. LPCI Pump A Discharge Flow - Low (Bypass)	1,2,3, 4(a),5(a)	1	E	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 900 gpm
g. Manual Initiation	1,2,3, 4(a),5(a)	1	C	SR 3.3.5.1.5	NA

(continued)

(a) When associated subsystem(s) are required to be OPERABLE.

(b) Also required to initiate the associated diesel generator.

Table 3.3.5.1-1 (page 2 of 5)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
2. LPCI B and LPCI C Subsystems					
a. Reactor Vessel Water Level - Low Low Low, Level 1	1,2,3, 4(a),5(a)	2 ^(b)	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ -147.7 inches
b. Drywell Pressure - High	1,2,3	2 ^(b)	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 1.88 psig
c. LPCI Pump B Start - Time Delay Logic Card	1,2,3, 4(a),5(a)	1	C	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 4.5 seconds and ≤ 5.5 seconds
d. Reactor Vessel Pressure - Low (Injection Permissive)	1,2,3 4(a),5(a)	4 4	C B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 452 psig and ≤ 478 psig ≥ 452 psig and ≤ 478 psig
e. LPCI Pump B and LPCI Pump C Discharge Flow - Low (Bypass)	1,2,3, 4(a),5(a)	1 per pump	E	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 900 gpm
f. Manual Initiation	1,2,3, 4(a),5(a)	1	C	SR 3.3.5.1.5	NA

(continued)

- (a) When associated subsystem(s) are required to be OPERABLE.
- (b) Also required to initiate the associated diesel generator.

Table 3.3.5.1-1 (page 3 of 5)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
3. High Pressure Core Spray (HPCS) System					
a. Reactor Vessel Water Level - Low, Level 2	1,2,3, 4(a),5(a)	4(b)	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ -47.7 inches
b. Drywell Pressure - High	1,2,3	4(b)	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 1.88 psig
c. Reactor Vessel Water Level - High, Level 8	1,2,3, 4(a),5(a)	2	C	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 54.2 inches
d. RCIC Storage Tank Level - Low	1,2,3, 4(c),5(c)	2	D	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 0 inches
e. Suppression Pool Water Level - High	1,2,3	2	D	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 12 inches
f. HPCS Pump Discharge Pressure - High (Bypass)	1,2,3, 4(a),5(a)	1	E	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 120 psig
g. HPCS System Flow Rate - Low (Bypass)	1,2,3, 4(a),5(a)	1	E	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 500 gpm
h. Manual Initiation	1,2,3, 4(a),5(a)	1	C	SR 3.3.5.1.5	NA

(continued)

- (a) When associated subsystem(s) are required to be OPERABLE.
- (b) Also required to initiate the associated diesel generator.
- (c) When HPCS is OPERABLE for compliance with LCO 3.5.2, "ECCS - Shutdown," and aligned to the RCIC storage tank while tank water level is not within the limits of SR 3.5.2.2.

SURVEILLANCE REQUIREMENTS

-----NOTES-----

1. Refer to Table 3.3.6.1-1 to determine which SRs apply for each Primary Containment and Drywell Isolation Function.
2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours, provided the associated Function maintains isolation capability.

SURVEILLANCE	FREQUENCY
SR 3.3.6.1.1 Perform CHANNEL CHECK.	12 hours
SR 3.3.6.1.2 Perform CHANNEL FUNCTIONAL TEST.	92 days
SR 3.3.6.1.3 Calibrate the analog trip module.	92 days
SR 3.3.6.1.4 Perform CHANNEL CALIBRATION.	92 days
SR 3.3.6.1.5 Perform CHANNEL CALIBRATION.	18 months
SR 3.3.6.1.6 Perform LOGIC SYSTEM FUNCTIONAL TEST.	18 months
SR 3.3.6.1.7 -----NOTES----- 1. Channel sensors are excluded. 2. The STAGGERED TEST BASIS Frequency for each Function shall be determined on a per channel basis. ----- Verify the ISOLATION SYSTEM RESPONSE TIME for the main steam isolation valves is within limits.	18 months on a STAGGERED TEST BASIS

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.5.1.5 -----NOTE----- Vessel injection/spray may be excluded. -----</p> <p>Verify each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal.</p>	<p>18 months</p>
<p>SR 3.5.1.6 -----NOTE----- Valve actuation may be excluded. -----</p> <p>Verify the ADS actuates on an actual or simulated automatic initiation signal.</p>	<p>18 months</p>
<p>SR 3.5.1.7 -----NOTE----- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. -----</p> <p>Verify each ADS valve opens when manually actuated.</p>	<p>18 months on a STAGGERED TEST BASIS for each valve solenoid</p>
<p>SR 3.5.1.8 -----NOTE----- ECCS actuation instrumentation is excluded. -----</p> <p>Verify the ECCS RESPONSE TIME for each ECCS injection/spray subsystem is within limits.</p>	<p>18 months</p>



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 98 TO FACILITY OPERATING LICENSE NO. NPF-62
ILLINOIS POWER COMPANY, ET AL.
CLINTON POWER STATION, UNIT NO. 1
DOCKET NO. 50-461

1.0 INTRODUCTION

Current technical specifications (TSs) require nuclear power plants to periodically perform response time testing for instrument channels on the reactor protection system (RPS), emergency core cooling systems (ECCS) and the isolation actuation instrumentation. The intent of these tests is to ensure that changes in response time of instrumentation beyond the limits assumed in safety analyses are detected, and combined with instrument calibration, to ensure that the instrument is operating correctly. The response time tests do not demonstrate that the instrument response time design value is met, but rather that the specified performance requirements of the TSs are satisfied.

By letter dated January 14, 1994, the Boiling Water Reactor Owners' Group (BWRG) submitted topical report NEDO-32291, "System Analyses for Elimination of Selected Response Time Testing Requirements," for staff review. The BWRG stated in NEDO-32291 that operational history has shown that significant degradation of instrumentation response times is being detected during the performance of calibrations and other surveillance tests. The BWRG further stated that the performance of conventional response time tests has proven to be of little value in assuring that instrumentation will perform as required or for determining the health of the instrument because the majority of allowable instrumentation response times are system response times rather than instrument times.

The primary argument provided in the topical report in support for the elimination of response time testing is that appropriate alternatives are currently in place per the criteria of Regulatory Guide 1.118, "Periodic Testing of Electric Power and Protection Systems," and IEEE 338-1977, "Criteria for the Periodic Testing of Nuclear Power Generating Station Safety Systems," which states:

"Response time testing of all safety-related equipment, per se, is not required if, in lieu of response time testing, the response time of the safety equipment is verified by functional testing, calibration checks or other tests, or both. This is acceptable if it can be demonstrated that changes in response time beyond acceptable limits are accompanied by changes in performance characteristics which are detectable during routine periodic tests."

By letter dated December 28, 1994, from B. Boger to R. Pinelli, the staff approved use of NEDO-32291 for the elimination of response time testing requirements. In the accompanying safety evaluation, the staff concluded that significant degradation of instrument response times, i.e., delays greater than about 5 seconds, can be detected during the performance of other surveillance tests, principally calibration, if properly performed. Accordingly, the staff concluded that response time testing can be eliminated from technical specifications for the selected instrumentation identified in the topical report and accepted NEDO-32291 for reference in license amendment applications for all boiling water reactors with the conditions discussed below:

When submitting plant-specific license amendment requests, licensees must confirm the applicability of the generic analysis of NEDO-32291 to their plant, and in addition to the request as shown in Appendix I of the topical report, the technical specification markup tables as shown in Appendix H, and a list of affected instrument loop components as shown in Appendix C.1, licensees must state that they are following the recommendations from EPRI NP-7243, "Investigation of Response Time Testing Requirements," and, therefore, are requiring the following actions:

- (a) Prior to installation of a new transmitter/switch or following refurbishment of a transmitter/switch (e.g., sensor cell or variable damping components), a hydraulic response time test shall be performed to determine an initial sensor-specific response time value, and
- (b) For transmitters and switches that use capillary tubes, capillary tube testing shall be performed after initial installation and after any maintenance or modification activity that could damage the lines.

Licensees must also state the following in their requests:

- (a) That calibration is being done with equipment designed to provide a step function or fast ramp in the process variable,
- (b) That provisions have been made to ensure that operators and technicians, through an appropriate training program, are aware of the consequences of instrument response time degradation, and that applicable procedures have been reviewed and revised as necessary to assure that technicians monitor for response time degradation during the performance of calibrations and functional tests,
- (c) That surveillance testing procedures have been reviewed and revised if necessary to ensure calibrations and functional tests are being performed in a manner that allows simultaneous monitoring of both the input and output response of units under test,

- (d) That for any request involving the elimination of response time testing for Rosemount pressure transmitters, the licensee is in compliance with the guidelines of Supplement 1 to Bulletin 90-01, "Loss of Fill-Oil in Transmitters Manufactured by Rosemount," and
- (e) That for those instruments where the manufacturer recommends periodic response time testing as well as calibration to ensure correct functioning, the licensee has ensured that elimination of response time testing is nevertheless acceptable for the particular application involved.

By letter dated January 27, 1995, Illinois Power submitted a license amendment application to eliminate instrument response time testing in accordance with NEDO-32291.

2.0 EVALUATION

The licensee's letter of January 27, 1995, referenced NEDO-32291 and proposed elimination of response time testing for selected parameters of the (1) Reactor Protection System (RPS), (2) Containment and Reactor Vessel Isolation Control System (CRVICS), and (3) Emergency Core Cooling System (ECCS). The licensee stated that the response time tests proposed for elimination are of little safety significance and result in unnecessary personnel radiation exposure, reduced availability of systems during plant shutdown, increased potential for inadvertent actuations of safety systems, and a significant burden to utility resources. The proposed changes to the Clinton Power Station (CPS) Technical Specifications are different than that provided in Appendix H of NEDO-32291 since CPS has recently adopted TS written in the Improved TS format. However, the proposed changes meet the intent of Appendix H of NEDO-32291.

In accordance with the conditions identified in the staff's safety evaluation, the licensee provided the following information:

- Illinois Power (IP) confirmed the applicability of NEDO-32291 to CPS. As identified in Appendix A of the topical report, IP was a participating utility in the evaluation. In addition, IP has confirmed that the components within the scope of the license amendment application have been evaluated in NEDO-32291. The components are identified in Table 1 of the staff's safety evaluation as those instruments/components for which response time testing can be eliminated.
- IP confirmed that CPS is in conformance with the following recommendations from EPRI NP-7243, "Investigation of Response Time Testing Requirements:"
 - (a) Prior to installation of a new transmitter/switch or following refurbishment of a transmitter/switch (e.g., sensor cell or variable damping components), a hydraulic response time test will be performed to determine an initial sensor-specific response time

value. IP committed to revise applicable CPS procedures prior to the upcoming refueling outage (RF-5) to fulfill this recommendation.

- (b) For transmitters and switches that use capillary tubes, capillary tube testing shall be performed after initial installation and after any maintenance or modification activity that could damage the lines. IP stated that CPS does not utilize any transmitters or switches that use capillary tubes in any application that requires response time testing. Therefore, this recommendation is not applicable to CPS.
- IP committed to revise applicable calibration procedures to include steps to input a fast ramp or step change to system components during calibrations.
 - IP has conducted training for operators and technicians in response to Requested Action 4.a of NRC Bulletin 90-01, "Loss of Fill-Oil in Transmitters Manufactured by Rosemount." In addition to addressing the symptoms that a transmitter exhibits if it is experiencing a loss of fill oil, this training also addressed the consequences of instrument response time degradation.
 - IP committed to revise surveillance testing procedures to ensure calibrations and functional tests are being performed in a manner that allows simultaneous monitoring of both the input and output response of units under test. The applicable calibration procedures will be revised to require the technicians at different locations to be in direct communication to verify that the response of the transmitter to a step input change is prompt, and in all cases less than five seconds.
 - IP has complied with the guidelines of Supplement 1 to NRC Bulletin 90-01. NRC's evaluation was documented in the staff's letter to IP dated June 15, 1994.
 - The components affected by this amendment request are limited to Rosemount transmitters model 1152, 1153, 1154; GE trip units model 147D8505; and GE solid-state logic cards which are currently exempt from response time testing. IP has reviewed the vendor recommendations for these devices and confirmed that they do not contain recommendations for periodic response time testing.

IP requested response time deletion for the main steam isolation valve closure actuation function which was not part of NEDO-32291. By letter dated February 10, 1995, from T. A. Green to Paul Loeser (NRC), adequate justification for the deletion of the response time test for this function was provided. The staff finds this acceptable.

The licensee also proposed moving existing SR 3.3.5.1.6 requirements that verify the ECCS response time limits from the instrumentation section to new SR 3.5.1.8 under TS 3.5.1, "ECCS-Operating." This change, which is outside the scope of NEDO-32291, would be accompanied by a note stating that the ECCS actuation instrumentation are excluded from the ECCS RESPONSE TIME test. ECCS response time operability requirements specify a time limit for the entire channel, from the time the monitored parameter exceeds its setpoint until the ECCS equipment is capable of performing its intended function. The frequency of this SR has been changed from "18 months on a STAGGERED TEST BASIS" to "18 months" in order to relate to the appropriate frequency for testing the associated ECCS subsystem (rather than the instrument channel). Moving the SR from the instrumentation section to the systems section of the TS represents a relaxation of requirements because existing SR 3.3.5.1.6 was applicable during all MODES of operation when the ECCS subsystems were required to be operable whereas SR 3.5.1.8 is only applicable during MODES 1, 2 and 3. The staff considers these changes acceptable because there are no design basis events during MODES 4 and 5 where the ECCS systems are relied upon and the response time tests, which are typically performed during shutdown conditions, would identify any operability problems that may exist. In addition, during MODES 4 and 5, the probability and consequences of accidents are reduced due to the pressure and temperature limitations of these MODES.

The staff has previously concluded that licensees may reference NEDO-32291 in license amendment applications provided that certain conditions are met. In their application dated January 27, 1995, the licensee addressed each of these conditions and the staff finds the responses acceptable. Therefore, the staff finds the licensee's proposed changes to the CPS TSs acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Illinois State official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

This amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluent that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding (60 FR 6739). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 CONCLUSION

The 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 the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Douglas V. Pickett

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