December 13, 1996 🧹

Mr. Paul J. Telthorst Director - Licensing Clinton Power Station P. O. Box 678 Mail Code V920 Clinton, IL 61727 Distribution w/encls:Docket FileGHill (2)PUBLICJRoePDIII-3 r/fCGrimesACRSOGCJCaldwell, RIIIGMarcusJWermielGMarcus

SUBJECT: ISSUANCE OF AMENDMENT NO. 111TO FACILITY OPERATING LICENSE NO. NPF-62 - CLINTON POWER STATION, UNIT 1 (TAC NO. M94888)

Dear Mr. Telthorst:

The U. S. Nuclear Regulatory Commission (Commission) has issued the enclosed Amendment No. 111 to Facility Operating License No. NPF-62 for the Clinton Power Station (CPS), Unit No. 1. The amendment is in response to your application dated February 22, 1996 (U-602522), and as supplemented by letters dated July 4 (U-602605) and September 20, 1996 (U-602640).

The amendment revises CPS Technical Specification 3.3.4.1, "End of Cycle Recirculation Pump Trip (EOC-RPT) Instrumentation," by deleting Surveillance Requirement 3.3.4.1.6 which requires the RPT breaker interruption time to be determined at least once per 60 months.

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

Sincerely,

Original signed by:

Douglas V. Pickett, 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. 111to NPF-62 2. Safety Evaluation



cc w/encls: See next page

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\*See JWermiel to GMarcus Memo of 11/18/96

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## UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

December 13, 1996

Mr. Paul J. Telthorst Director - Licensing Clinton Power Station P. O. Box 678 Mail Code V920 Clinton, IL 61727

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Docket No. 50-461

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cc w/encls: See next page

Mr. Paul J. Telthorst Illinois Power Company

cc: Mr. Wilfred Connell Vice President Clinton Power Station Post Office Box 678 Clinton, Illinois 61727

Mr. Daniel P. Thompson 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

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Regional Administrator, Region III U.S. Nuclear Regulatory Commission 801 Warrenville Road Lisle, Illinois 60532-4351

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

Mr. J. W. Blattner Project Manager Sargent & Lundy Engineers 55 East Monroe Street Chicago, Illinois 60603 Clinton Power Station Unit No. 1

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



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. 111 License No. NPF-62 L

- 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 February 22, 1996, and supplemented by letters dated July 4 and September 20, 1996, 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 reguirements 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) <u>Technical Specifications and Environmental Protection Plan</u>

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 111 , 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

Dougla V Pichett

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

Attachment: Changes to the Technical Specifications

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Date of Issuance: December 13, 1996

## ATTACHMENT TO LICENSE AMENDMENT NO.111

## 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

Insert Pages

3.3-27

-

3.3-27

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE			FREQUENCY
SR	3.3.4.1.2	Perform CHANNEL CALIBRATION. The Allowable Values shall be: a. TSV Closure: ≤ 7% closed; and b. TCV Fast Closure, Trip Oil Pressure—Low: ≥ 465 psig.	18 months
SR	3.3.4.1.3	Perform LOGIC SYSTEM FUNCTIONAL TEST, including breaker actuation.	18 months
SR	3.3.4.1.4	Verify TSV Closure and TCV Fast Closure, Trip Oil Pressure—Low Functions are not bypassed when THERMAL POWER is $\geq$ 40% RTP.	18 months
SR	3.3.4.1.5	The STAGGERED TEST BASIS Frequency shall be determined on a per Function basis.	
		Verify the EOC-RPT SYSTEM RESPONSE TIME is within limits.	18 months on a STAGGERED TEST BASIS



UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

## SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

## RELATED TO AMENDMENT NO. 111 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

By letter dated February 22, 1996, and supplemented by letters dated July 4 and September 20, 1996, Illinois Power, the licensee, requested changes to Facility Operating License No. NPF-62, Appendix A Technical Specifications, for Clinton Power Station (CPS). The requested changes would revise CPS Technical Specification 3.3.4.1, "End of Cycle Recirculation Pump Trip (EOC-RPT) Instrumentation," by deleting Surveillance Requirement 3.3.4.1.6 which requires the RPT breaker interruption time to be determined at least once per 60 months.

#### 2.0 BACKGROUND

By letter dated February 22, 1996 (Ref 1), the licensee proposed the elimination of the reactor recirculation pump (RPT) breaker interruption time testing requirements from the Technical Specifications (TS) for CPS. The EOC-RPT instrumentation initiates a RPT in the event of a turbine trip or generator load rejection transient. This is intended to reduce the peak reactor pressure and power, and provides additional margin to core thermal Minimum Critical Power Ratio Safety Limits for these events.

The EOC-RPT system sensors detect initiation of closure of the main turbine stop valves (TSV) and fast closure of the main turbine control valves (TCV). When the sensor channel set point is exceeded, switches close to provide a signal to the EOC-RPT trip logic. When the EOC-RPT breakers trip open, the recirculation pumps downshift to slow speed. Actuation of the EOC-RPT logic trips both recirculation pumps from fast speed operation. There are two EOC-RPT breakers in series per recirculation pump. Both EOC-RPT breakers for each recirculation pump trip upon actuation of the EOC-RPT system.

Surveillance Requirement (SR) 3.3.4.1.5 of the CPS Technical Specifications (TS), requires that EOC-RPT SYSTEM RESPONSE TIME tests be conducted on an 18-month STAGGERED TEST BASIS on a per Function basis. As described in the TS Bases, all channels of one Function are tested every 18 months on an alternating basis such that both Functions are tested every 36 months. Response times cannot be determined with the reactor at power because the reactor recirculation pumps must be tripped.

9612190335 961213 PDR ADOCK 05000461 PDR The CPS TS defines EOC-RPT SYSTEM RESPONSE TIME as the time interval from initial movement of the associated TSV or TCV to complete suppression of the electric arc between the fully open contacts of the recirculation pump circuit breaker. The RPT breaker interruption time portion of the EOC-RPT RESPONSE TIME is required to be determined at least once per 60 months for each pair of pump breakers in accordance with SR 3.3.4.1.6 of the CPS TS and is defined in the Bases for SR 3.3.4.1.6 as breaker response time plus arc suppression time. Breaker response time is defined as the time from application of voltage to the trip coil until the main contacts separate. Arc suppression time is defined as the time from pump breaker of the electrical arc across the open contacts.

In their submittal of February 22, 1996, the licensee stated that RPT breaker interruption time testing is unnecessary and requested elimination of the requirement. They stated that the test necessitates the use of temporarily installed equipment and requires extensive planning and preparation. In addition, the nature of the test (i.e., the very short time periods associated with the breaker arc suppression time and the delay introduced by the current transducers) presents a challenge to both the equipment used to record the test response time and to the capability of precisely determining the actual breaker arc suppression time. The licensee also stated that discussions with the breaker manufacturer have confirmed that measurement of the arc suppression time is unnecessary and that actual arc suppression times are not subject to change for properly maintained breakers. IP and the manufacturer believe that the robust design of the EOC-RPT breakers provides assurance of continued satisfactory performance, and that any degradation of the breaker that could cause significant degradation of the arc suppression time is prevented by performance of recommended preventive maintenance or is detected by other required testing. The licensee stated that actual measurement of breaker interruption time does not provide any additional assurance of safety and proposed using 95 milliseconds as an assumed arc suppression time. This value would be used in lieu of an actual measured arc suppression time when determining EOC-RPT SYSTEM RESPONSE TIME.

In their submittal, the licensee proposed the following changes to CPS TS 3.3.4.1, "End of Cycle - Recirculation Pump Trip (EOC-RPT) Instrumentation":

- 1. Deletion of SR 3.3.4.1.6 which requires periodic verification of RPT breaker interruption time.
- 2. Deletion of Note 1 to SR 3.3.4.1.5 which references SR 3.3.4.1.6. Note 2 to SR 3.3.4.1.5 will remain as an unnumbered note.

The staff had several questions on the original submittal, and these were contained in a request for additional information (RAI) dated April 24, 1996 (Ref 2). These questions were answered in Reference 3, Illinois Power Company letter "Clinton Power Station Response to Request for Additional Information Related to Proposed Amendment of Facility Operating License No. NPF-62 (LS-94-004)" dated July 4, 1996. On September 20, 1996, CPS submitted a modification to their original request to include a modification of the wording within the TS Bases for Section SR 3.3.4.1.5. (Ref 4). The wording was revised to acknowledge that a mechanical timing check of the RPT breakers is performed as part of the preventive maintenance performed to validate or maintain the assumed EOC-RPT breaker response time. The TS Bases are also being revised to specify the acceptance criterion for the mechanical timing check. The new wording will read:

#### SR 3.3.4.1.5

This SR ensures that the individual channel response times are less than or equal to the maximum values assumed in the accident analysis. The EOC-RPT SYSTEM RESPONSE TIME acceptance criteria are included in applicable plant procedures. The EOC-RPT SYSTEM RESPONSE TIME, includes an assumed RPT breaker interruption time of 95 milliseconds. The assumed RPT breaker interruption time is validated by the performance of periodic mechanical timing checks, contact gap measurements and high potential tests on each breaker in accordance with plant procedures at least once per 36 months. The acceptance criterion for the RPT breaker mechanical timing check shall be  $\leq$ 34 milliseconds.

EOC-RPT SYSTEM RESPONSE TIME tests are conducted on an 18 month STAGGERED TEST BASIS. The Note requires STAGGERED TEST BASIS frequency to be determined on a per Function bases. This is accomplished by testing all channels of one Function every 18 months on an alternating basis such that both Functions are tested every 36 months. This Frequency is based on the logic interrelationships of the various channels required to produce an EOC-RPT signal. Response times cannot be determined at power because operation of final actuated devices is required. Therefore, this frequency is consistent with the typical industry refueling cycle and is based upon plant operating experience, which shows that random failures of instrumentation components that cause serious response time degradation, but not channel failure, are infrequent occurrences.

#### 3.0 EVALUATION:

IP has requested that response time testing of breaker interruption time be discontinued, and that for the purpose of determining response time of the EOC-RPT system, an assumed breaker interruption time of 95 milliseconds be used in lieu of an actual measured time. The assumed value of 95 milliseconds is based on:

- 1. A maximum time value of 95 milliseconds has been substantiated by IP during past surveillance testing at CPS,
- 2. The vendor specified breaker interruption time is 50 milliseconds, which is much less than the proposed assumed value, and
- 3. Testing of the circuit breaker during equipment qualification testing confirmed an actual breaker interruption time of 24 to 34 milliseconds.

The staff agrees with the above justification and, therefore, finds that 95 milliseconds is a conservative value for breaker interruption time for a properly operating breaker.

IP has stated that the assumed breaker interruption time will be validated through measurement of the contact gap separation and the contact gap resistance. These measurements are required by CPS procedures at least once per 36 months, and provide assurance of proper electrical performance of the breakers. Adequate mechanical performance of the breakers is demonstrated by a logic functional test at least once every 18 months. This test, SR 3.3.4.1.3, includes actuation of the breakers.

IP has provided additional justification to rely on an assumed breaker interruption time:

- 1. The manufacturer's recommended maintenance cycle for the breakers is based on an expected 2,000 cycles of the circuit breaker. The EOC-RPT breakers are subjected to less than 1% of this amount of cycling during the current 36 month maintenance cycle. In fact, the EOC-RPT breakers are not expected to be subjected to 2,000 cycles during the life of the plant. Because the utilization of the EOC-RPT breakers at CPS is much less than the utilization for which the breakers are designed, the possibility of degraded performance is reduced.
- 2. The design of the breaker is such that there is seldom failure of the breaker to open within the vendor specified time limits that does not also result in a failure of the breaker to operate. Problems with the mechanism of the breaker would most likely cause mechanical failures, not a degradation of performance that would cause the breaker to open in a time greater than the vendor specified time limit. Thus, while degradation of the breaker mechanism that would impact the mechanical opening time of the breaker may be possible, the breaker mechanism would be expected to fail to operate rather than fail in a manner that would be difficult for operators and maintenance personnel to recognize.
- 3. Proper setting of the contact gaps ensures the air gap separation will be sufficient to extinguish the arc and halt current flow. This does not involve disassembly of the breaker and thus will not cause degraded performance of the breaker. Verification of proper contact gap settings ensures that there will be sufficient air gap during opening of the breaker. The air gap is one of the most significant parameters in extinguishing the arc.
- 4. The performance of a high potential test verifies that the breaker insulation is adequate to eliminate the possibility of stray paths that would allow current flow after the breaker has opened. Therefore, the only path for current is through the breaker contacts. This provides assurance that the current flow through the breaker will be halted when the breaker is called upon to open for an EOC-RPT trip.

5. The proposed change to eliminate interruption time testing has been discussed with the breaker manufacturer and the intended treatment of response time testing is consistent with the manufacturer's recommendations for testing and maintenance of the breakers. (As discussed in Reference 3, the breakers are Westinghouse Class IE, safety-related, type 75DVP500.) The vendor has stated that breaker interruption time testing is not recommended because breaker interruption time does not change. The vendor further states that maintenance and testing that includes high potential testing and measuring of the contact gap for each breaker (as presently being performed at CPS) will provide assurance that the breaker interruption time will continue to be within assumed limits.

To substantiate the assertion that any failure which could cause significant degradation of the arc suppression time is prevented or detected by performance of recommended preventive maintenance, the licensee was asked to submit a failure modes and effects analysis (FMEA) (Ref.2).

IP submitted the following FMEA in response (Ref 3):

Applicable failure modes that would render the EOC-RPT breakers inoperable (with respect to opening of the breaker on demand) are a catastrophic failure and a degraded type of failure:

- (1) A catastrophic failure of the vacuum breaker to open on demand would be caused by failure of the operating mechanism or vacuum interrupters. To maintain high performance and reliability with respect to these potential failure modes, maintenance is performed on the breakers in accordance with vendor recommendations. Preventive maintenance tasks include checking the interrupter for vacuum and contact wear gap, checking and adjusting the mechanism latches, lubrication, and testing that includes megger and ductor testing.
- (2) Degraded failure of the vacuum breaker to open, i.e., a slow trip, would be caused by degradation of the operating mechanism. Again, proper maintenance (the preventive tasks described above) prevents such failures. Westinghouse Instruction Bulletin (I.B.) 32253-3B includes a section on the mechanical timing of breakers which states, "The breakers are checked at the factory for contact speed and contact bounce. These values do not change appreciably during the mechanical life of the breaker and are not considered as a part of the regular inspection and maintenance program."

While this is not a complete FMEA, as the components within the breaker are not analyzed for failure modes and effects, it is sufficient to show that the two primary failures, failure of the operating mechanism or of the vacuum interrupters have been considered and addressed. . -

There is no failure probability data available specifically for the Westinghouse DVP-type breakers such as the EOC-RPT breakers used at CPS. Industry data is available for failure rates of the DHP metal-clad drawout type breakers. This data can provide some perspective on the reliability of the DVP breakers considering that the DVP breakers can be expected to be more reliable. (The DVP breakers utilize fewer moving parts due to the vacuum technology employed. Further, although CPS is only in its sixth operating cycle, performance of the DVP breakers has been excellent as no failures or degradation has occurred to date.) The IEEE failure rate data for the DHP breakers includes catastrophic, degraded and incipient modes of failure, but does not include a failure mode specifically identified as "failure to open within specified time limits." Nevertheless, the data can serve to provide a gauge of reliability. Per IEEE 500-1984, the expected failure rate for the composite of all failure modes of metal clad drawout circuit breakers (rated at greater than 600 volts) is 0.4 failures per one million hours. The IEEE failure rate number is conservative as it includes data from Class 1E and non-1E equipment supplied by a large number of manufacturers.

The staff asked IP to provide a copy of the manufacturer's recommended breaker maintenance practices, including recommended maintenance intervals. In addition, IP was asked to provide a copy of the CPS required maintenance schedule.

In response, IP provided Section 6 of Westinghouse DVP Circuit Breaker Manual I.P.32-253-3B, "Instructions for Porcel-line Type DVP Vacuum Circuit Breakers," as Enclosure 1 to Reference 3. Proper maintenance, according to the manufacturer, consists of the following:

- 1. Check contact wear gap
- 2. Check vacuum Interrupter assembly
- 3. Mechanical timing test
- 4. Clean insulation
- 5. Lubrication

IP also provided copies of the applicable CPS Preventive Maintenance (PM) Task Descriptions. These PMs trigger performance of CPS Electrical Maintenance Procedure No. 8410.07, which was also provided. The staff review of this information verified that the CPS maintenance program for the breakers is consistent with the manufacturer's recommendations.

Based on our review of the information provided, the staff concurs that use of an assumed 95 milliseconds for breaker interruption time will provide a conservative value when performing routine breaker performance surveillances. The staff also agrees that a properly maintained breaker does not appear to have failure modes which will affect response time or arc suppression time which would not be detected by existing routine surveillances and maintenance procedures. The staff has also reviewed the CPS maintenance procedures and concurs that they are consistent with the manufacturers recommendations. The staff, therefore, concludes that the proposed changes are acceptable.

#### 4.0 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.

#### 5.0 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 or changes a surveillance requirement. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents 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 on such finding (61 FR 18169). 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.

#### 6.0 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: Paul Loeser

Date: December 13, 1996

#### References:

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- Illinois Power Company letter "Clinton Power Station Proposed amendment of Facility Operating License No. NPF-62 (LS-94-004)" dated February 22, 1996
- 2. NRC letter "Request for Additional Information Concerning Proposed Change Eliminating the End Of Cycle Recirculation Pump Trip Breaker Interruption Time Testing Requirements - Clinton power Station, Unit No 1 (TAC No. 94888)" dated April 24, 1996.
- 3. Illinois Power Company letter "Clinton Power Station Response to Request for Additional Information Related to Proposed Amendment of Facility Operating License No. NPF-62 (LS-94-004)" dated July 4, 1996.
- 4. Illinois Power submitted "Clinton Power Station Submittal on Additional Changes to the Technical Specification Basis in Support of Proposed Amendment of Facility Operating License No. NPF-62 (LS-94-004)" dated September 20, 1996.