

August 13, 1998

Distribution w/encls:

Mr. Joseph V. Sipek  
Director - Licensing  
Clinton Power Station  
P.O. Box 678  
Mail Code V920  
Clinton, IL 61727

Docket File  
PUBLIC  
PDIII-3 r/f  
ACRS  
GGrant, RIII  
TLH3 (SE only)  
GHill (2)  
EGAI  
WBeckner  
OGC  
RBellamy  
DDesaulniers

SUBJECT: ISSUANCE OF AMENDMENT NO. 115 AND PARTIAL DENIAL OF AMENDMENT TO FACILITY OPERATING LICENSE NO. NPF-62 - CLINTON POWER STATION, UNIT 1 (TAC NO. M93993)

Dear Mr. Sipek:

The U.S. Nuclear Regulatory Commission (Commission) has issued the enclosed Amendment No.115 to Facility Operating License No. NPF-62 for the Clinton Power Station, Unit 1. The amendment is in response to your application dated October 27, 1995 (U-602462).

The amendment changes Technical Specification (TS) 5.2.2.e, "Unit Staff," by revising the requirements for controls on the working hours of unit staff who perform safety related functions. The amendment clarifies the approval requirements for deviations from the overtime guidelines. As set forth in the enclosed Safety Evaluation, the proposed change to TS 5.2.2.e regarding removal of the requirement for monthly review of individual overtime has been denied. Notice of Partial Denial is enclosed.

Notice of Issuance and Notice of Partial Denial will be included in the Commission's next biweekly Federal Register notice.

Sincerely,

Original signed by:

Jon B. Hopkins, Sr. 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. 115 to NPF-62  
2. Safety Evaluation  
3. Notice of Partial Denial

cc w/encls: See next page

DOCUMENT NAME: G:\CLINTON\CL93993.AMD

\* See previous concurrence

OFFICE	LA:PD33	PM:PD33	PM:PD33	BC:HOHB	PD:PD33	BC:TSB	OGC
NAME	EBarnhill	AHanser	JHopkins	RGallo *	RBellamy	WBeckner	
DATE	7/14/98	7/14/98	7/14/98	7/2/98	7/14/98	7/14/98	7/26/98

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OFFICE	LA:PD33	PM:PD33	PM:PD33	BC:HOHB	PD:PD33	BC:TSB	OGC
NAME	EBarnhill	AHansen	JHopkins	RGallo *	RBellamy	WBeckner	
DATE	7/14/98	7/14/98	7/14/98	7/2/98	7/14/98	7/14/98	7/26/98

*Handwritten signatures and initials*

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

August 13, 1998

Mr. Joseph V. Sipek  
Director - Licensing  
Clinton Power Station  
P.O. Box 678  
Mail Code V920  
Clinton, IL 61727

SUBJECT: ISSUANCE OF AMENDMENT NO. 115 AND PARTIAL DENIAL OF AMENDMENT TO  
FACILITY OPERATING LICENSE NO. NPF-62 - CLINTON POWER STATION,  
UNIT 1 (TAC NO. M93993)

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Sincerely,

A handwritten signature in cursive script that reads "Jon B. Hopkins, Sr.".

Jon B. Hopkins, Sr. 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. 115 to NPF-62  
2. Safety Evaluation  
3. Notice of Partial Denial

cc w/encls: See next page

Joseph V. Sipek  
Illinois Power Company

Clinton Power Station, Unit 1

cc:

Walter G. MacFarland IV  
Senior Vice President  
Clinton Power Station  
P.O. Box 678  
Clinton, IL 61727

Illinois Department of Nuclear Safety  
Office of Nuclear Facility Safety  
ATTN: Mr. Frank Nizidlek  
1035 Outer Park Drive  
Springfield, IL 62704

Wayne Romberg  
Manager Nuclear Station  
Engineering Department  
Clinton Power Station  
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Clinton, IL 61727

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VP, General Counsel & Corp. Secretary  
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Decatur, IL 62525

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Regional Administrator, Region III  
U.S. Nuclear Regulatory Commission  
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Chairman of DeWitt County  
c/o County Clerk's Office  
DeWitt County Courthouse  
Clinton, IL 61727

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



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

ILLINOIS POWER COMPANY

DOCKET NO. 50-461

CLINTON POWER STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 115  
License No. NPF-62

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Illinois Power Company (the licensee), dated October 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:

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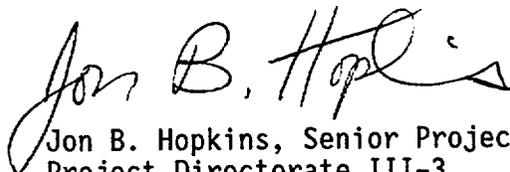
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(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 115, 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 and shall be implemented no later than 90 days after issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Jon B. Hopkins, 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: August 13, 1998

ATTACHMENT TO LICENSE AMENDMENT NO. 115

FACILITY OPERATING LICENSE NO. NPF-62

DOCKET NO. 50-461

Replace the following page of the Appendix "A" Technical Specifications with the attached page. The revised page is identified by amendment number and contains a vertical line indicating the area of change.

Remove Pages

5.0-4

Insert Pages

5.0-4

## 5.2 Organization

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### 5.2.2 Unit Staff (continued)

4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the plant manager or his designee, in accordance with administrative procedures with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the plant manager, or his designee, to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

- f. The operations manager or at least one operations middle manager shall hold an SRO license for Clinton Power Station.
  - g. The Shift Technical Advisor (STA) shall provide advisory technical support to the SS in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.
-



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 115 TO FACILITY OPERATING LICENSE NO. NPF-62  
ILLINOIS POWER COMPANY  
CLINTON POWER STATION, UNIT 1  
DOCKET NO. 50-461

1.0 INTRODUCTION

By letter dated October 27, 1995, Illinois Power Company, the licensee, requested a revision to the Clinton Power Station (CPS) Technical Specifications (TSs). The proposed amendment would change TS 5.2.2.e, "Unit Staff," by revising the requirements for controls on the working hours of unit staff who perform safety-related functions. The proposal would clarify the approval requirements for deviations from the overtime guidelines and eliminate the requirement for a monthly review of individual overtime.

2.0 BACKGROUND

The NRC issued Generic Letter (GL) 82-12, "Nuclear Power Plant Staff Working Hours," dated June 15, 1982, to clarify the Commission's policy on restricting the use of overtime for licensee personnel who perform safety-related functions. The GL requested that utilities revise the Administrative Controls Section of their TSs to assure that plant administrative procedures follow the working hour guidelines set forth in the revised policy statement (an attachment to the GL), including a provision for documentation of authorized deviations. The NRC subsequently issued Generic Letter 83-02, "NUREG-0737 Technical Specifications," dated January 10, 1983, which transmitted a model TS for the implementation of the Commission's policy.

NUREG-1434, "Standard Technical Specifications, General Electric Plants, BWR/6," dated September 1992, includes requirements for the control of overtime consistent with the policy statement of GL 82-12. TS 5.2.2.e of NUREG-1434 provides utilities with two options: (1) prescribing specific requirements in the TS itself; or (2) including a paragraph that commits to the policy as described in GL 82-12. When the licensee implemented NUREG-1434, option (1) was selected. Option (1) is largely the same as the model technical specification transmitted by GL 83-02 and includes a paragraph explicitly addressing review of individual overtime. This paragraph states that, "Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the (plant superintendent) or his designee to ensure that excessive hours have not been assigned." The requirements set forth in this paragraph are not explicitly addressed by GL 82-12.

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### 3.0 EVALUATION

Currently, TS 5.5.2.e.4 reads:

4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the plant manager or his designee, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the plant manager, or his designee, to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

The licensee's proposal modifies TS 5.5.2.e.4 by deleting wording from the last two paragraphs of the TS and combining the two into one paragraph which states:

Any deviation from the above guidelines shall be authorized by the plant manager or his designee, in accordance with administrative procedures with documentation of the basis for granting the deviation. Routine deviation from the above guidelines is not authorized.

This modification effectively results in two changes to the current TS 5.5.2.e.4 as described below.

The first change to TS 5.2.2.e.4 clarifies the requirements for the plant manager or his designee to approve deviations from the overtime guidelines in accordance with administrative procedures. The current TS requirements potentially permit any of three levels of responsibility to approve deviations from the overtime guidelines: (1) the plant manager; (2) persons designated by the plant manager in accordance with approved administrative procedures; and (3) levels of management higher than the plant manager. The licensee states that the third classification of personnel does not need to be specified in the TS since, for administrative activities such as this, higher levels of management always have the authority to authorize activities under their area of responsibility. Specifically, at the Clinton Power Station, the only level of management higher than the plant manager is the site Vice-President. Furthermore, the inclusion of the third option in the TS is unclear with regard to the level of personnel the plant manager may designate for this function. Finally, it is not the intent that only higher levels of management may be designated to perform this approval for the plant manager.

The staff has reviewed this proposed change and determined that it does not alter any technical requirements since the same level of approval will be required and the same level of assurance of alertness will be maintained for the unit staff who perform safety-related functions. Therefore, the staff finds this proposed change acceptable.

The second change to TS 5.2.2.e.4 revises the last paragraph to eliminate the requirement for a monthly review of individual overtime. From experience gained in complying with the monthly review requirement at CPS, the licensee states that the review has not provided any additional benefit (beyond the requirements or controls prescribed in GL 82-12) for controlling individual overtime. The licensee further states that compiling a monthly report to facilitate a monthly review and performing the review has been a costly administrative burden that is not warranted.

The staff has reviewed this proposed change and determined that the proposed change would result in working hours controls that would not be sufficient to assure that adequate shift coverage is maintained without routine heavy use of overtime.

The objective of the Commission's policy promulgated by GL 82-12 is "to assure, to the extent practicable, that personnel are not assigned to shift duties that could significantly reduce their mental alertness or their decision making capability." To this end the Commission provided general guidelines for the control of overtime, citing overtime as a key job-related factor that influences fatigue. The Commission recognized that circumstances may require deviation from the policy guidelines and included provisions in the policy for approval of the deviations by the plant manager or his designee. The staff subsequently developed model TSs that embodied the Commission policy, as presented in GL 83-02.

The licensee's proposed TS amendment would eliminate subsequent monthly review by plant management to assess the actual deviations from the overtime guidelines and the potential for personnel fatigue to have an adverse effect on plant safety. The model TSs include a requirement for a monthly review of individual overtime by the plant superintendent or his designee "to assure that excessive hours have not been assigned." Since the policy does not impose specific limits on the size or frequency of deviations from the guidelines and allows delegation of authority to deviate from the guidelines, the monthly review provides a means for ensuring that plant management is cognizant of cumulative overtime use, that overtime authorizations do not become routine, and that personnel are not impaired by the cumulative fatigue that can result from excessive deviations from the policy guidelines. Consequently, the staff finds this portion of the proposed amendment unacceptable. Therefore, this portion is denied.

A second amendment justification offered by the licensee is that NUREG-1434 allows licensees the option to commit to GL 82-12, which does not explicitly address monthly reviews. Commission policy statements, by their nature, do not address all administrative controls that may be necessary for a licensee to conduct their operations in accordance with the policy. The issuance of model TSs by GL 82-16 and 83-02 was intended to address just this matter for

the Commission's working hours policy. In addition, it was not the staff's intent to provide an optional TS wording that would afford a different level of assurance that the policy objectives are met. Consequently, the staff has taken action to eliminate the apparent inconsistency between the two options in NUREG-1434 for the working hours TSs as documented in a letter dated April 9, 1997, from Mr. C. Grimes (NRC) to Mr. J. Davis of the Nuclear Energy Institute (enclosed).

In summary, the staff approves in part and denies in part the licensee's submittal. The staff accepts the licensee's request to eliminate specific wording granting levels of management higher than the plant manager authority to approve deviations from the overtime guidelines in accordance with administrative procedures. However, the staff denies the licensee's request to remove the monthly review of individual overtime.

#### 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 recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendment meets 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 or environmental assessment need be prepared in connection with the issuance of this 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 Contributors: R. Laufer  
D. Desaulniers  
A. Hansen

Date: August 13, 1998



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

April 9, 1997

Mr. James Davis  
Nuclear Energy Institute  
1776 Eye Street, N. W.  
Suite 300  
Washington, DC 20006-2496

Dear Mr. Davis:

As you know, the NRC cancelled its plans to issue a Generic Letter for a line-item improvement to the technical specification administrative controls section, to devote more resources to conversion reviews and additional improvements to the improved standard technical specifications (STS). However, the proposed Generic Letter would have included several changes to the administrative controls to accommodate changes to 10 CFR 20 and 10 CFR 50.36a. In addition, since the issuance of Administrative Letter 95-06 on the relocation of administrative controls related to quality assurance, the staff has identified additional changes to the administrative controls to better accommodate the staffing requirements in 10 CFR Part 50 and Part 55, and to include a new staff position regarding controls for the working hours of personnel who perform safety-related functions.

Enclosure 1 is an NRC proposed change, TSB-011, to the administrative controls section of the STS to reflect the changes described above. In addition, the Technical Specifications Task Force (TSTF) has proposed similar changes to the STS in TSTF-86 and TSTF-121. We request that the TSTF modify their proposals in these travelers, or withdraw those changes and submit a new traveler, to reflect consistent changes to the administrative controls for all versions of the STS. Should you have any questions regarding this matter, please contact Bob Tjader at 301-415-1187.

Sincerely,

A handwritten signature in cursive script, appearing to read "C. Grimes".

Christopher I. Grimes, Chief  
Technical Specifications Branch  
Associate Director for Projects  
Office of Nuclear Reactor Regulation

Enclosure: as stated

cc: C. Szabo, BWOG  
L. Bush, WOG  
B. Mann, CEOG  
A. Maron, BWROG  
B. Ford, BWROG  
D. Hoffman, EXCEL

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Nuclear Energy Institute  
1776 Eye Street, N. W.  
Suite 300  
Washington, DC 20006-2496

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Original Signed By

Christopher I. Grimes, Chief  
Technical Specifications Branch  
Associate Director for Projects  
Office of Nuclear Reactor Regulation

Enclosure: as stated

- cc: C. Szabo, BWOG
- L. Bush, WOG
- B. Mann, CEOG
- A. Maron, BWROG
- B. Ford, BWROG
- D. Hoffman, EXCEL

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DOCUMENT NAME: G:\TRT\AC-TSTF2.REV \*see previous concurrences

OFFICE	TSB:ADPR:NRR	C:HHFB:DRCH:NRR	NRR/ADPR/TSB
NAME	TRTjader*	COTomas*	CIGrimes
DATE	4/03/97	4/08/97	4/9/97

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### **Justification of Changes:**

Revision of TS 5.2 and TS 5.3 on staff work hours and staffing requirements removes requirements redundant to regulations while retaining elements required in TS by regulations. Revisions of 10 CFR Part 20 and 10 CFR 50.36a have superseded related information in the TS and other regulations, thereby prompting NRC to propose this generic change traveller to update the STS. The model STS provided in this package are specifically intended to eliminate possible confusion or improper implementation of the revised 10 CFR Part 20 requirements.

### **Staffing Requirements and Working Hours TS Changes (TS 5.2 & TS 5.3)**

Revision of TS 5.2.2.e on unit staff working hours reflects recent CRGR-approved changes to the STS. This change, to existing STS paragraph 5.2.2.e, from specific working hour limits to administrative procedures to control working hours will provide reasonable assurance that impaired performance caused by excessive working hours will not jeopardize safe plant operation. Specific working hour limits are not otherwise required to be in the technical specifications under 10 CFR 50.36(c)(5). Specific controls for working hours of reactor plant staff can be described in a licensee procedure that requires a deliberate decision making process to minimize the potential for impaired personnel performance, and that a licensee's established procedure control processes will provide sufficient control for changes to that procedure. These programs have a level of detail necessary to satisfy the policy statement (SECY-93-067) guidance and are retained in the Administrative Controls section of the TS. Therefore, the procedures and details can be relocated outside the TS.

Existing STS paragraph 5.2.2.b is deleted because it is redundant to 10 CFR 50.54(m)(2)(iii).

Existing STS paragraphs 5.2.2.c is revised and a new STS paragraph 5.3.2 is added to ensure that there is no misunderstanding when complying with 10 CFR 55.4 requirements.

### **Changes to TS resulting from 10 CFR 20 Changes (TS 5.5.4 & TS 5.7)**

Revisions of 10 CFR Part 20 and 10 CFR 50.36a have superseded related information in the TS and other regulations, thereby prompting NRC to propose this generic change traveler to update the STS. While 10 CFR Part 20 allows licensees to implement the rule without having to make any changes to their approved TS, the NRC has crafted the enclosed model STS sections to provide acceptable language that correlates with the wording in the revised 10 CFR Part 20 and 10 CFR 50.36a. Additionally, in accordance with 10 CFR 20.1601(c), the proposed model STS for high radiation areas contain updated acceptable alternate controls to those given in 10 CFR 20.1601 and Regulatory Guide 8.38. Licensees may propose other alternate high radiation area controls based on their plant specific needs.

In the case of gaseous and liquid effluent release rates, the model STS were crafted to allow licensees to maintain their same overall level of effluent control while retaining the operational flexibility that exists with current STS under the previous 10 CFR Part 20. The model STS continue to require that radiation doses to members of the public from gaseous and liquid effluent releases from nuclear power plants be within the values given in Appendix I to 10 CFR Part 50 and the limits in 10 CFR Part 20.

The model STS provided in this letter are specifically intended to eliminate possible confusion or improper implementation of the revised 10 CFR Part 20 requirements.

## 5.2 Organization

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### 5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. A non-Licensed Operator shall be assigned to each reactor containing fuel and an additional non-Licensed Operator shall be assigned for each unit when a reactor is operating in MODES 1, 2, 3, or 4.

[Two unit sites with both units shutdown or defueled, a total of three non-Licensed operators are required for the two units.]

- ~~b. At least one licensed Reactor Operator (RO) shall be in the Control Room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Reactor Operator (SRO) shall be in the Control Room Area.~~

- ~~eb. Shift crew composition shall meet the requirements stipulated herein and in 10 CFR 50.54(m). Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.~~

- ~~ec. A [Health Physics Technician] shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.~~

- ~~ed. Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., licensed Senior Reactor Operators (SROs), licensed Reactor Operators (ROs), health physicists, auxiliary operators, and key maintenance personnel).~~

~~The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.~~

~~Any deviation from the working hour guidelines shall be authorized in advance by the [Plant Superintendent] or the [Plant Superintendent's] designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation.~~

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Continued

## 5.2 Organization

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### 5.2.2 Unit Staff (Continued)

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the [Plant Superintendent] or the [Plant Superintendent's] designee to ensure that excessive hours have not been assigned. Routine deviation from the working hour guidelines shall not be authorized.

- fe. The [Operations Manager or Assistant Operations Manager] shall hold an SRO license.
  - gf. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Supervisor (SS) in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.
-

TSB FORM 2		U.S. NUCLEAR REGULATORY COMMISSION		PACKAGE NO. TSB- 011	DATE 04/02/97
<b>NRC Proposed Change to the STS</b>					
Originator:	R. Tjader	Mgr Approved:		Date:	11/07/96
Purpose of Change:	Update STS to Reflect 10 CFR 20 and 10 CFR 50.36a Changes				
NUREGs Changed	1430: X			1431: X	
	1432: X	1433: X		1434: X	
<b>Technical Specifications Changed:</b> 1) Change Admin Controls Sections 5.2 and 5.3 on unit staffing requirements 2) Change Admin Controls Section 5.5.4, Radioactive Effluent Controls Program 3) Replace Admin Controls Section 5.7, High Radiation Area					
<b>Description of Change:</b> Revise STS Admin Controls Sections 5.2 on Unit Staff and 5.3 on Unit Staff Qualifications to remove requirements redundant with regulations. Change/replace STS Admin Controls Sections 5.5.4 and 5.7, respectively, to reflect 10 CFR 20 and 10 CFR 50.36a changes, to maintain consistency between the STS and regulation.					
<b>Justification of Change:</b> Revision of TS 5.2.2.e on unit staff working hours reflects recent CRGR-approved changes to the STS. Revision of TS 5.3 on staffing requirements removes requirements redundant to regulations while retaining elements required in TS by regulations. Revisions of 10 CFR Part 20 and 10 CFR 50.36a have superseded related information in the TS and other regulations, thereby prompting NRC to propose this generic change traveller to update the STS. The model STS provided in this package are specifically intended to eliminate possible confusion or improper implementation of the revised 10 CFR Part 20 requirements. (See attached justification.)					
Entered Database	Date:	11/7/96	Filename:	g:\forms\changes.mdb	
<b>NRC REVIEW OF PROPOSED STS CHANGE</b>					
TSB Reviewer:	R. Tjader	Tech Reviewer:	S. Klementowicz	(if review required)	
Recommendation	Date:	11/7/96	Recommendation:	Date:	11/8/96
[X] APPROVE [ ] MODIFY [ ] REJECT			[X] APPROVE [ ] MODIFY [ ] REJECT		
<b>Comments:</b> See above Justification as attachments to traveller. 3/3/97 pkg was incorporated as an enclosure to a letter to NEI and provided to C. Grimes for signature. This change was to have been provided under a Generic Letter, which was cancelled. 4/2/97 TS 5.2 and 5.3 added to package; package forwarded to C. Grimes for disposition.			<b>Comments:</b>		
<b>PROPOSED STS CHANGE DISPOSITION</b>					
TSB Action	Date:	4/9/97	TSTF Action (if applicable)	Date:	
[X] APPROVED [ ] MODIFIED [ ] REJECTED			[ ] APPROVED [ ] REVISED [ ] APPEALED		
<b>Comments:</b>			<b>Comments:</b>		
<b>STS FILE AND RECORD DATA CHANGES</b>					
<b>ACTION</b>	<b>BY</b>	<b>DATE</b>	<b>ACTION</b>	<b>BY</b>	<b>DATE</b>
WP Files Updated			Changes Certified		
Changes Proofed			Access Database Updated		
Returned for Corrections			Comment Resolution Database Updated		
Control Books Updated			Close-out Letter Sent to TSTF		
BBS Files Updated			Package Filed		

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

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[Reviewer's Note: Minimum qualifications for members of the unit staff shall be specified by use of an overall qualification statement referencing an ANSI Standard acceptable to the NRC staff or by specifying individual position qualifications. Generally, the first method is preferable; however, the second method is adaptable to those unit staffs requiring special qualification statements because of unique organizational structures.]

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of [Regulatory Guide 1.8, Revision 2, 1987, or more recent revisions, or ANSI Standard acceptable to the NRC staff]. The staff not covered by [Regulatory Guide 1.8] shall meet or exceed the minimum qualifications of [Regulations, Regulatory Guides, or ANSI Standards acceptable to NRC staff].

5.3.2 For the purpose of 10 CFR 55.4, a licensed senior reactor operator (SRO) and a licensed reactor operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).  
[Reviewer's Note: The minimum staffing requirements stipulated in 10 CFR 50.54(m), for unit members actively performing the functions of an operator or senior operator, can be exceeded by stipulating the enhanced staffing requirements in paragraph 5.3.2.]

#### 5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to ~~10 CFR 20, Appendix B, Table 2, Column 2;~~ *to 10 CFR 20.1001-20.2402* *10 times the concentration values in*
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;
- d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from each unit to unrestricted areas, conforming to 10 CFR 50, Appendix I;
- e. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days;
- f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the guidelines for the annual dose or dose commitment, conforming to 10 CFR 50, Appendix I;
- g. Limitations on the dose rate *from the site* *atom* resulting from radioactive material released in gaseous effluents *atom* to areas *atom* beyond the site boundary ~~conforming to the dose associated with 10 CFR 20, Appendix B, Table 2, Column 1,~~
- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and

*insert next page*

beyond the site boundary,

- j. Limitations on the annual dose or dose commitment to any member of the public, due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

shall be limited to the following:

1. For noble gases: less than or equal to a dose rate of 500 mrem/yr to the total body and less than or equal to a dose of 3000 mrem/yr to the skin, and
2. For iodine-131, iodine 133, tritium, and for all radionuclides in particulate form with half-lives greater than 8 days: less than or equal to a dose rate of 1500 mrem/yr to any organ.

insert to previous pg.

**5.5.4****Radioactive Effluent Controls Program**

This program conforming to 10 CFR 50.36a provides for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by operating procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents from the site to UNRESTRICTED AREAS, conforming to 10 times the concentration values in Appendix B, Table 2, Column 2 to 10 CFR 20.1001-20.2402;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents pursuant to 10 CFR 20.1302 and with the methodology and parameters in the ODCM;
- d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from each unit to unrestricted areas, conforming to 10 CFR 50, Appendix I;
- e. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days;
- f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2 percent of the guidelines for the annual dose or dose commitment, conforming to 10 CFR 50, Appendix I;
- g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents from the site to areas at or beyond the SITE BOUNDARY shall be limited to the following:
  1. For noble gases: less than or equal to a dose rate of 500 mrem/yr to the total body and less than or equal to a dose rate of 3000 mrem/yr to the skin, and
  2. For iodine-131, iodine-133, tritium, and for all radionuclides in particulate form with half-lives greater than 8 days: less than or equal to a dose rate

of 1500 mrem/yr to any organ;

- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas at or beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and
- j. Limitations on the annual dose or dose commitment to any member of the public, beyond the SITE BOUNDARY, due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.



High Radiation Area  
5.7

**5.0  
ADMINISTRATIVE CONTROLS**

**5.7  
High Radiation Area**

As provided in paragraph 20.1601(c) of 10 CFR Part 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraph 20.1601(a) and (b) of 10 CFR Part 20:

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**5.7.1  
High Radiation Areas with Dose Rates Not Exceeding 1.0 rem/hour at 30 Centimeters from the Radiation Source or from Any Surface Penetrated by the Radiation:**

- a. Each entryway to such an area shall be barricaded and conspicuously posted as a high radiation area. Such barricades may be opened as necessary to permit entry or exit of personnel or equipment.
- b. Access to, and activities in, each such area shall be controlled by means of Radiation Work Permit (RWP) or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.
- c. Individuals qualified in radiation protection procedures (e.g., health physics technicians) and personnel continuously escorted by such individuals may be exempted from the requirement for an RWP or equivalent while performing their assigned duties provided that they are following plant radiation protection procedures for entry to, exit from, and work in such areas.
- d. Each individual or group entering such an area shall possess:
  1. A radiation monitoring device that continuously displays radiation dose rates in the area; or

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**Continued**

5.7 High Radiation Area

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5.7.1  
(continued)

2. A radiation monitoring device that continuously integrates the radiation dose rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or
  3. A radiation monitoring device that continuously transmits dose rate and cumulative dose to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area, or
  4. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,
    - (i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or
    - (ii) Be under the surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with and control every individual in the area.
- e. Except for individuals qualified in radiation protection procedures, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them.

5.7.2

High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from Any Surface Penetrated by the Radiation, but Less than 500 rads/hour at 1 Meter from the Radiation Source or from Any Surface Penetrated by the Radiation:

- a. Each entryway to such an area shall be conspicuously posted as a high radiation area and shall be provided with a locked

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Continued

**5.7 High Radiation Area**

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**5.7.2  
(continued)**

**door or gate that prevents unauthorized entry, and, in addition:**

1. All such door and gate keys shall be maintained under the administrative control of the shift supervisor, radiation protection manager, or his or her designee.
  2. Doors and gates shall remain locked except during periods of personnel or equipment entry or exit.
- b. Access to, and activities in, each such area shall be controlled by means of an RWP or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.
- c. Individuals qualified in radiation protection procedures may be exempted from the requirement for an RWP or equivalent while performing radiation surveys in such areas provided that they are following plant radiation protection procedures for entry to, exit from, and work in such areas.
- d. Each individual or group entering such an area shall possess:
1. A radiation monitoring device that continuously integrates the radiation rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or
  2. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area with the means to communicate with and control every individual in the area, or

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Continued

**5.7 High Radiation Area**

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**5.7.2  
(continued)**

- 3. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,**
    - (i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or**
    - (ii) Be under the surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with and control every individual in the area, or**
  - 4. In those cases where options (2) and (3), above, are impractical or determined to be inconsistent with the "As Low As is Reasonably Achievable" principle, a radiation monitoring device that continuously displays radiation dose rates in the area.**
  - e. Except for individual qualified in radiation protection procedures, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them.**
  - f. Such individual areas that are within a larger area that is controlled as a high radiation area, where no enclosure exists for the purpose of locking and where no enclosure can reasonable be constructed around the individual area need not be controlled by a locked door or gate, but shall be barricaded and conspicuous, clearly visible flashing light shall be activated at the area as a warning device.**
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UNITED STATES NUCLEAR REGULATORY COMMISSIONILLINOIS POWER COMPANYCLINTON POWER STATION, UNIT 1DOCKET NO. 50-461NOTICE OF PARTIAL DENIAL OF AMENDMENT TO FACILITY  
OPERATING LICENSE AND OPPORTUNITY FOR HEARING

The U.S. Nuclear Regulatory Commission (the Commission) has partially denied a request by Illinois Power Company (the licensee) to amend Facility Operating License NPF-62 issued to the licensee for operation of the Clinton Power Station, Unit 1, located in DeWitt County, Illinois. Notice of Consideration of Issuance of the amendment was published in the FEDERAL REGISTER on December 20, 1995 (60 FR 65681).

The purpose of the licensee's amendment request was to revise Technical Specification (TS) 5.2.2.e, "Unit Staff," by revising the requirements for controls on the working hours of unit staff who perform safety related functions and by removing the requirement for monthly review of individual overtime.

The proposed changes were denied in part. The licensee's request to remove the monthly review of individual overtime requirement was denied because this removal would result in working hours controls that would not be sufficient to assure that adequate shift coverage is maintained without routine heavy use of overtime.

The NRC staff has concluded that part of the licensee's request cannot be granted. The licensee was notified of the Commission's partial denial of the proposed change by letter dated August 13, 1998.

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By September 21, 1998, the licensee may demand a hearing with respect to the partial denial described above. Any person whose interest may be affected by this proceeding may file a written petition for leave to intervene. A request for hearing or petition for leave to intervene must be filed with the Secretary of the Commission, U.S. Nuclear Regulatory Commission, Washington, DC 20555, Attention: Rulemakings and Adjudications Staff, or may be delivered to the Commission's Public Document Room, the Gelman Building, 2120 L Street, NW., Washington, DC, by the above date.

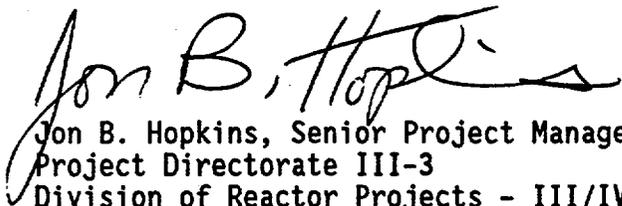
A copy of any petition should also be sent to the Office of the General Counsel, U.S. Nuclear Regulatory Commission, Washington, DC 20555, and to Leah Manning Stetzner, Vice President, General Counsel, and Corporate Secretary, 500 South 27th Street, Decatur, IL 62525, attorney for the licensee.

For further details with respect to this action, see (1) the application for amendment dated October 27, 1995, and (2) the Commission's letter to the licensee dated August 13, 1998.

These documents are available for public inspection at the Commission's Public Document Room and at the local public document room located at the Vespasian Warner Public Library, 120 West Johnson Street, Clinton, IL 61727.

Dated at Rockville, Maryland, this 13th day of August 1998.

FOR THE NUCLEAR REGULATORY COMMISSION

  
Jon B. Hopkins, Senior Project Manager  
Project Directorate III-3  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

By September 21, 1998, the licensee may demand a hearing with respect to the partial denial described above. Any person whose interest may be affected by this proceeding may file a written petition for leave to intervene. A request for hearing or petition for leave to intervene must be filed with the Secretary of the Commission, U.S. Nuclear Regulatory Commission, Washington, DC 20555, Attention: Rulemakings and Adjudications Staff, or may be delivered to the Commission's Public Document Room, the Gelman Building, 2120 L Street, NW., Washington, DC, by the above date.

A copy of any petition should also be sent to the Office of the General Counsel, U.S. Nuclear Regulatory Commission, Washington, DC 20555, and to Leah Manning Stetzner, Vice President, General Counsel, and Corporate Secretary, 500 South 27th Street, Decatur, IL 62525, attorney for the licensee.

For further details with respect to this action, see (1) the application for amendment dated October 27, 1995, and (2) the Commission's letter to the licensee dated August 13, 1998.

These documents are available for public inspection at the Commission's Public Document Room and at the local public document room located at the Vespasian Warner Public Library, 120 West Johnson Street, Clinton, IL 61727.

Dated at Rockville, Maryland, this 13th day of August 1998.

FOR THE NUCLEAR REGULATORY COMMISSION

Original signed by:

Jon B. Hopkins, Senior Project Manager  
Project Directorate III-3  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

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