Docket No. 50-461

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Dear Mr. Spangenberg:

DHagan

SUBJECT:

AMENDMENT NO. 63 TO FACILITY OPERATING LICENSE

NO. NPF-62 (TAC NO. M82829)

The Commission has issued the enclosed Amendment No. 63 to Facility Operating License No. NPF-62 for the Clinton Power Station, Unit No. 1. This amendment revises the Technical Specifications (TS) in response to your application dated February 21, 1992.

The amendment modifies TS 6.3, "UNIT STAFF QUALIFICATIONS," by deleting redundant wording regarding "Radiation Protection Manager" qualifications in TS 6.3.1.

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 C. E. Carpenter for Anthony T. Gody, Jr., Project Manager Project Directorate III-3 Division of Reactor Projects III/IV/V Office of Nuclear Reactor Regulation

Enclosures:

Amendment No. 63 to License No. NPF-62

Safety Evaluation

cc w/enclosures: See next page

LA:PD33:DRPW PKreutzer

PM: PD33: DRPW MAGody, Jr./sw D:PD38,DBPW

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3/2/192 DOCUMENT NAME: B\CL82829.AMD

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Mr. Frank A. Spangenberg Illinois Power Company

cc:

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UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555

ILLINOIS POWER COMPANY, ET AL.

DOCKET NO. 50-461

CLINTON POWER STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.63 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 February 21, 1992, 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.

Technical Specifications and Environmental Protection Plan (2)

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 63, are hereby incorporated into this Illinois Power Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

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

FOR THE NUCLEAR REGULATORY COMMISSION

John N. Hannon, Director Project Directorate III-3 Division of Reactor Projects III/IV/V

Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of issuance: April 27, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 63

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 vertical lines indicating the area of change. The corresponding overleaf page is provided to maintain document completeness.

<u>Remove</u> <u>Insert</u> 6-7

ADMINISTRATIVE CONTROLS

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed minimum qualifications of ANSI/ANS 3.1-1978. The Director - Plant Operations shall have held an SRO license for Clinton Power Station; the Supervisor - Plant Operations shall hold an SRO license for Clinton Power Station.

6.4 TRAINING

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

6.5 REVIEW AND AUDIT

6.5.1 FACILITY REVIEW GROUP (FRG)

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

COMPOSITION

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



UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION RELATED TO AMENDMENT NO. 63 TO FACILITY OPERATING LICENSE NO. NPF-62

ILLINOIS POWER COMPANY, ET AL.

CLINTON POWER STATION, UNIT NO. 1

DOCKET NO. 50-461

1.0 <u>INTRODUCTION</u>

On February 21, 1992, the Illinois Power Company (IP), the licensee, submitted an application to amend Facility Operating License No. NPF-62, Appendix A - Technical Specifications (TS), for the Clinton Power Station (CPS). The amendment would delete a specific reference to the "Director - Plant Radiation Protection" in TS 6.3.1.

2.0 DISCUSSION

Qualification requirements for plant staff members are prescribed under TS 6.3, "Unit Staff Qualifications." TS 6.3.1 currently states, "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 except the Director - Plant Radiation Protection who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975." The intent of this exception for the Director - Plant Radiation Protection is to impose stricter qualification requirements for this position relative to the 1971 version of this ANSI standard; however, IP is committed to the 1978 version. As this (TS) requires compliance with the 1978 version, the exception is redundant. Therefore, IP submitted a proposal to delete this phrase from the TS.

3.0 EVALUATION

The September 1975 version of Regulatory Guide 1.8, "Personnel Selection and Training," was written to address ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel." Although this ANSI standard did prescribe qualification requirements for supervisory-level radiation protection personnel (Ref. Section 4.4.4),* the NRC determined, as documented in the Regulatory Guide, that the recommended qualification requirements were insufficient.

*ANSI N18.1-1971 recommended that the responsible person (in the area of radiation protection) "have a minimum of five years experience in radiation protection at a nuclear reactor facility. A minimum of two years of this five years experience should be related technical training. A maximum of four years of this five years experience may be fulfilled by related or academic training."

The NRC indicated in the Regulatory Position section of Regulatory Guide 1.8 (1975), "The criteria for the selection and training of nuclear power plant personnel contained in ANSI N18.1-1971 ... are generally acceptable and provide an adequate basis for the selection and training of nuclear power plant personnel except for the position Supervisor - Radiation Protection (hereafter referred to as Radiation Protection Manager [RPM])." Specifically, the following enhanced qualification requirements were prescribed for the RPM:

The Radiation Protection Manager (RPM) should be an experienced professional in applied radiation protection at nuclear facilities dealing with radiation protection problems and programs similar to those at nuclear power stations. The RPM should be familiar with the design features and operations of nuclear power stations that affect the potential for exposures of persons to radiation. The RPM should have the technical competence to establish radiation protection programs and the supervisory capability to direct the work of professionals, technicians, and journeymen required to implement the radiation protection programs.

The RPM should have a bachelor's degree or the equivalent in a science or engineering subject, including some formal training in radiation protection. The RPM should have at least five years of professional experience in applied radiation protection. (A master's degree may be considered equivalent to two years of professional experience where course work related to radiation protection is involved.) At least three years of this professional experience should be in applied radiation protection work in a nuclear facility dealing with radiological problems similar to those encountered in nuclear power stations, preferably in an actual nuclear power station.

After issuance of the September 1975 version of Regulatory Guide 1.8, ANSI N18.1-1971 was revised to ANSI/ANS 3.1-1978. As a part of this revision, section 4.4.4 was revised, incorporating the qualification requirements specified for the RPM in Regulatory Guide 1.8 (1975). With respect to the qualification requirements for the RPM, the combination of ANSI N18.1-1971 and the qualification enhancements/exception provided in Regulatory Guide 1.8 thus became equivalent to ANSI/ANS 3.1-1978.

At one time, as it appeared in the draft CPS Technical Specifications, TS 6.3.1 referred to ANSI N18.1-1971 (along with the exception referring to Regulatory Guide 1.8). Later, during further development of the draft TSs for CPS, the licensee modified this reference to ANSI/ANS 3.1-1978 consistent with the version of the standard referenced in the CPS USAR but failed to delete the exception specified for the Director-Plant Radiation Protection.

Deletion of this wording from TS 6.3.1 eliminates an unnecessary reference to a specific job/position title in the CPS plant staff organization. Consistent with the intent of the Generic Letter 88-06 (Subject: Removal of Organizational

Charts from TS Administrative Control Requirements), this change could prevent unnecessary changes to the TS (and thus, eliminate unnecessary license amendments) in the future due to title/organizational changes involving the "Director-Plant Radiation Protection."

It should be emphasized that the proposed change does not involve a change to the qualification requirements for unit staff personnel including the position that is equivalent to the "responsible person (Professional - Technical, Radiation Protection)" identified in the ANSI standard or the "Radiation Protection Manger" identified in Regulatory Guide 1.8. The reference to ANSI/ANS 3.1-1978 in TS 6.3.1 remains unchanged consistent with IP's commitment to this standard as identified in the CPS USAR.

Therefore, the staff approves the proposed modification to TS 6.3.1

4.0 STATE CONSULTATION

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

5.0 ENVIRONMENTAL CONSIDERATION

This amendment relates to changes in 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 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: A. Gody, Jr.

Date: April 27, 1992