

November 3, 1994

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

SUBJECT: ISSUANCE OF AMENDMENT NO. 94 TO FACILITY OPERATING LICENSE NO.  
NPF-62 - CLINTON POWER STATION, UNIT 1 (TAC NO. M90225)

Dear Mr. Phares:

The U.S. Nuclear Regulatory Commission (Commission) has issued the enclosed Amendment No. 94 to Facility Operating License No. NPF-62 for the Clinton Power Station, Unit No. 1. The amendment is in response to your application dated August 12, 1994 (U-602297).

The amendment modifies Technical Specifications (TS) 3/4.3.1, "Reactor Protection System Instrumentation," TS 3/4.3.2, "Containment and Reactor Vessel Isolation Control System," TS 3/4.3.3, "Emergency Core Cooling System Actuation Instrumentation," TS 3/4.3.4.2, "End-of-Cycle Recirculation Pump Trip System Instrumentation," TS 3/4.3.5, "Reactor Core Isolation Cooling System Actuation Instrumentation," TS 3/4.4.2.1, "Safety/Relief Valves," and TS 3/4.4.2.2, "Safety/Relief Valves Low-Low Set Function." These TS contain requirements to perform manual testing of the associated solid state logic at least once every four fuel cycles on a staggered basis. This testing is in addition to the automatic testing performed by the self-test system. This amendment removes the requirement to perform manual testing of the solid state logic when the automatic testing is already performed.

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, 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. 94 to NPF-62  
2. Safety Evaluation

cc w/encls: See next page

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Illinois Power Company

Clinton Power Station  
Unit No. 1

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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. 94  
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 August 12, 1994, 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.

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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. 94, 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



Cynthia A. Carpenter, Acting Director  
Project Directorate III-3  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: November 3, 1994

ATTACHMENT TO LICENSE AMENDMENT NO. 94

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. The corresponding overleaf pages, indicated by an asterisk, are provided to maintain document completeness.

Remove Pages

3/4 3-1  
3/4 3-12  
3/4 3-33  
3/4 3-34\*  
3/4 3-51\*  
3/4 3-52  
3/4 3-57\*  
3/4 3-58  
3/4 3-97\*  
3/4 3-98  
3/4 4-10  
3/4 4-11

Insert Pages

3/4 3-1  
3/4 3-12  
3/4 3-33  
3/4 3-34\*  
3/4 3-51\*  
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3/4 3-58  
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### 3/4.3 INSTRUMENTATION

#### 3/4.3.1 REACTOR PROTECTION SYSTEM INSTRUMENTATION

##### LIMITING CONDITION FOR OPERATION

3.3.1 As a minimum, the reactor protection system instrumentation channels shown in Table 3.3.1-1 shall be OPERABLE\* with the REACTOR PROTECTION SYSTEM RESPONSE TIME as shown in Table 3.3.1-2.

APPLICABILITY: As shown in Table 3.3.1-1.

##### ACTION:

- a. For all functional units of Table 3.3.1-1 other than Reactor Mode Switch Shutdown Position.
  1. With one of the four channels required for any Trip Function inoperable, operation may continue provided the inoperable channel is placed in the tripped condition within 48 hours. The provisions of Specification 3.0.4 are not applicable.
  2. With two of the four channels required for any Trip Function inoperable, place one channel in the tripped condition within six hours provided no tripped channel for that Trip Function already exists. The provisions of Specification 3.0.4 are not applicable.
  3. With three of the four channels required for any Trip Function inoperable, take the ACTION required by Table 3.3.1-1.
- b. For Reactor Mode Switch Shutdown Position take the ACTION as shown in Table 3.3.1-1.

##### SURVEILLANCE REQUIREMENTS

4.3.1.1 Each reactor protection system instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations for the OPERATIONAL CONDITIONS and at the frequencies shown in Table 4.3.1.1-1.

4.3.1.2 LOGIC SYSTEM FUNCTIONAL TESTS shall be performed at least once per 18 months.

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\*A channel may be placed in an inoperable status for up to 6 hours for required surveillance provided at least two OPERABLE channels are monitoring that parameter.

## INSTRUMENTATION

### CONTAINMENT AND REACTOR VESSEL ISOLATION CONTROL SYSTEM

#### LIMITING CONDITION FOR OPERATION (Continued)

##### 3.3.2 ACTION (Continued):

2. With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip System requirement for both trip systems, place at least one trip system\* in the tripped condition within 1 hour and take the ACTION required by Table 3.3.2-1.

#### SURVEILLANCE REQUIREMENTS

4.3.2.1 Each CRVICS channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations for the OPERATIONAL CONDITIONS and at the frequencies shown in Table 4.3.2.1-1.

4.3.2.2 LOGIC SYSTEM FUNCTIONAL TESTS shall be performed at least once per 18 months.

4.3.2.3 The CRVICS RESPONSE TIME of each CRVICS trip function shown in Table 3.3.2-3 shall be demonstrated to be within its limit at least once per 18 months. Each test shall include at least one logic train tested at least once per 36 months, and one channel per trip function such that all channels are tested at least once every N times 18 months, where N is the total number of redundant channels in a specific CRVICS trip function.

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\*The trip system need not be placed in the tripped condition if this would cause the Trip Function to occur. When a trip system can be placed in the tripped condition without causing the Trip Function to occur, place the trip system with the most inoperable channels in the tripped condition; if both systems have the same number of inoperable channels, place either trip system in the tripped condition.

## INSTRUMENTATION

### 3/4.3.3 EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION

#### LIMITING CONDITION FOR OPERATION

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3.3.3 The emergency core cooling system (ECCS) actuation instrumentation channels shown in Table 3.3.3-1 shall be OPERABLE with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3.3-2 and with EMERGENCY CORE COOLING SYSTEM RESPONSE TIME as shown in Table 3.3.3-3.

APPLICABILITY: As shown in Table 3.3.3-1.

#### ACTION:

- a. With an ECCS actuation instrumentation channel trip setpoint less conservative than the value shown in the Allowable Value column of Table 3.3.3-2, declare the channel inoperable until the channel is restored to OPERABLE status with its trip setpoint adjusted consistent with the Trip Setpoint value.
- b. With one or more ECCS actuation instrumentation channels inoperable, take the ACTION required by Table 3.3.3-1.
- c. With either ADS trip system "1" or "2" inoperable, restore the inoperable trip system to OPERABLE status within:
  1. 7 days, provided that the HPCS and RCIC systems are OPERABLE, or
  2. 72 hours, provided either the HPCS or RCIC systems are inoperable.

Otherwise, be in at least HOT SHUTDOWN within the next 12 hours and reduce reactor steam dome pressure to  $\leq 100$  psig within the following 24 hours.

#### SURVEILLANCE REQUIREMENTS

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4.3.3.1 Each ECCS actuation instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations for the OPERATIONAL CONDITIONS and at the frequencies shown in Table 4.3.3.1-1.

4.3.3.2 LOGIC SYSTEM FUNCTIONAL TESTS shall be performed at least once per 18 months.

4.3.3.3 The ECCS RESPONSE TIME of each ECCS trip function shown in Table 3.3.3-3 shall be demonstrated to be within the limit at least once per 18 months. Each test shall include at least one channel per trip system such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific ECCS trip system.

TABLE 3.3.3-1

EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION

<u>TRIP FUNCTION</u>	<u>MINIMUM OPERABLE CHANNELS PER TRIP FUNCTION</u>	<u>APPLICABLE OPERATIONAL CONDITIONS</u>	<u>ACTION</u>
<b>A. <u>DIVISION I TRIP SYSTEM</u></b>			
<b>1. <u>RHR-A (LPCI MODE) &amp; LPCS SYSTEM</u></b>			
a. Reactor Vessel Water Level - Low Low Low, Level 1	2(b)(a)(e)	1, 2, 3, 4*, 5*	30
b. Drywell Pressure - High	2(b)(a)(e)	1, 2, 3	30
c. Reactor Vessel Pressure-Low (LPCI and LPCS Injection Valve Permissive)	4(a)(e)	1, 2, 3, 4*, 5*	32
d. LPCI Pump (A) Start Time Delay Logic Card	1(e)	1, 2, 3, 4*, 5*	32
e. LPCS Pump Discharge Flow - Low**	1(e)	1, 2, 3, 4*, 5*	40
f. LPCI Pump (A) Discharge Flow - Low**	1(e)	1, 2, 3, 4*, 5*	40
g. Manual Initiation	1(b)	1, 2, 3, 4*, 5*	35
<b>2. <u>AUTOMATIC DEPRESSURIZATION SYSTEM TRIP SYSTEM "1" ADS LOGIC "A" AND "E"</u></b>			
a. Reactor Vessel Water Level - Low Low Low, Level 1	2(a)(e)	1, 2, 3	30
b. Drywell Pressure - High	2(a)(e)	1, 2, 3	30
c. ADS Timer	1(e)	1, 2, 3	32
d. Reactor Vessel Water Level - Low, Level 3 (Permissive)	1(e)	1, 2, 3	30
e. LPCS Pump Discharge Pressure-High (Permissive)	2(a)(e)	1, 2, 3	32
f. LPCI Pump (A) Discharge Pressure-High (Permissive)	2(a)(e)	1, 2, 3	32
g. ADS Drywell Pressure Bypass Timer	2(e)	1, 2, 3	32
h. Manual Inhibit ADS Switch	1	1, 2, 3	35
i. Manual Initiation	2	1, 2, 3	35

CLINTON - UNIT 1

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Amendment No. 71  
APR 9 1993

TABLE 4.3.4.1-1

ATWS RECIRCULATION PUMP TRIP ACTUATION INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>TRIP FUNCTION</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL FUNCTIONAL TEST</u>	<u>CHANNEL CALIBRATION</u>
1. Reactor Vessel Water Level - Low Low, Level 2	S	Q	R*
2. Reactor Vessel Pressure - High	S	Q	R*

\*Calibrate trip unit at least once per 92 days.

## INSTRUMENTATION

### END-OF-CYCLE RECIRCULATION PUMP TRIP SYSTEM INSTRUMENTATION

#### LIMITING CONDITION FOR OPERATION

3.3.4.2 The end-of-cycle recirculation pump trip (EOC-RPT) system instrumentation channels shown in Table 3.3.4.2-1 shall be OPERABLE with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3.4.2-2 and with the END-OF-CYCLE RECIRCULATION PUMP TRIP SYSTEM RESPONSE TIME as shown in Table 3.3.4.2-3.

APPLICABILITY: OPERATIONAL CONDITION 1, when THERMAL POWER is  $\geq$  to 40% of RATED THERMAL POWER.

#### ACTION:

- a. With an end-of-cycle recirculation pump trip function instrumentation channel trip setpoint less conservative than the value shown in the Allowable Value column of Table 3.3.4.2-2, declare the channel inoperable until the channel is restored to OPERABLE status with the channel setpoint adjusted consistent with the Trip Setpoint value.
- b. With one of the four channels required for any Trip Function inoperable, operation may continue provided the inoperable channel is placed in the tripped condition within 48 hours. The provisions of Specification 3.0.4 are not applicable.
- c. With two of the four channels required for any Trip Function inoperable, place one channel in the tripped condition within six hours provided no tripped channel for that Trip Function already exists. The provisions of Specification 3.0.4 are not applicable.
- d. With three of the four channels required for any Trip Function inoperable, reduce THERMAL POWER to less than 40% of RATED THERMAL POWER within 6 hours.

#### SURVEILLANCE REQUIREMENTS

4.3.4.2.1 Each end-of-cycle recirculation pump trip system instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3.4.2-1.

4.3.4.2.2 LOGIC SYSTEM FUNCTIONAL TESTS shall be performed at least once per 18 months.

TABLE 4.3.4.2-1

END-OF-CYCLE RECIRCULATION PUMP TRIP SYSTEM SURVEILLANCE REQUIREMENTS

<u>TRIP FUNCTION</u>	<u>CHANNEL FUNCTIONAL TEST</u>	<u>CHANNEL CALIBRATION</u>
1. Turbine Stop Valve-Closure	Q	R
2. Turbine Control Valve-Fast Closure	Q	R

CLINTON - UNIT 1

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Amendment No. 71  
APR 9 1993

## INSTRUMENTATION

### 3/4.3.5 REACTOR CORE ISOLATION COOLING SYSTEM ACTUATION INSTRUMENTATION

#### LIMITING CONDITION FOR OPERATION

3.3.5 The reactor core isolation cooling (RCIC) system actuation instrumentation channels shown in Table 3.3.5-1 shall be OPERABLE with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3.5-2.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3 with reactor steam dome pressure greater than 150 psig.

#### ACTION:

- a. With an RCIC system actuation instrumentation channel trip setpoint less conservative than the value shown in the Allowable Value column of Table 3.3.5-2, declare the channel inoperable until the channel is restored to OPERABLE status with its trip setpoint adjusted consistent with the Trip Setpoint value.
- b. With one or more RCIC system actuation instrumentation channels inoperable, take the ACTION required by Table 3.3.5-1.

#### SURVEILLANCE REQUIREMENTS

4.3.5.1 Each RCIC system actuation instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3.5.1-1.

4.3.5.2 LOGIC SYSTEM FUNCTIONAL TESTS shall be performed at least once per 18 months.

INSTRUMENTATION

3/4.3.9 PLANT SYSTEMS ACTUATION INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

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3.3.9 The plant systems actuation instrumentation channels shown in Table 3.3.9-1 shall be OPERABLE with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3.9-2.

APPLICABILITY: As shown in Table 3.3.9-1.

ACTION:

- a. With a plant system actuation instrumentation channel trip setpoint less conservative than the value shown in the Allowable Value column of Table 3.3.9-2, declare the channel inoperable until the channel is restored to OPERABLE status with its trip setpoint adjusted consistent with the Trip Setpoint value.
- b. With one or more plant systems actuation instrumentation channels inoperable, take the ACTION required by Table 3.3.9-1.

INSTRUMENTATION

PLANT SYSTEMS ACTUATION INSTRUMENTATION

SURVEILLANCE REQUIREMENTS

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4.3.9.1 Each plant system actuation instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations for the OPERATIONAL CONDITIONS and at the frequencies shown in Table 4.3.9.1-1.

4.3.9.2 LOGIC SYSTEM FUNCTIONAL TESTS shall be performed at least once per 18 months.

REACTOR COOLANT SYSTEM

SAFETY/RELIEF VALVES

SURVEILLANCE REQUIREMENTS

4.4.2.1.1 The acoustic monitor for each safety/relief valve shall be demonstrated OPERABLE by performance of a:

- a. CHANNEL FUNCTIONAL TEST at least once per 31 days, and a
- b. CHANNEL CALIBRATION at least once per 18 months.\*

4.4.2.1.2 The relief valve function pressure actuation instrumentation shall be demonstrated OPERABLE by performance of a:

- a. CHANNEL FUNCTIONAL TEST, including calibration of the trip unit, at least once per 92 days.
- b. CHANNEL CALIBRATION and LOGIC SYSTEM FUNCTIONAL TEST at least once per 18 months.

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\*The provisions of Specification 4.0.4 are not applicable provided the surveillance is performed within 12 hours after reactor steam pressure and flow are adequate to perform the test.

REACTOR COOLANT SYSTEM

SAFETY/RELIEF VALVES LOW-LOW SET FUNCTION

LIMITING CONDITION FOR OPERATION

3.4.2.2 The low-low set function of the following reactor coolant system safety/relief valves shall be OPERABLE with the following settings\*:

<u>Valve No.</u>	<u>Low-Low Set Function Setpoint* (psig) ± 15 psi</u>	
	<u>Open</u>	<u>Close</u>
F051D	1033	926
F051C	1073	936
F047F	1113	946
F051B	1113	946
F051G	1113	946

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

- a. With the low-low set function of one of the above required reactor coolant system safety/relief valves inoperable, restore the inoperable low-low set function to OPERABLE status within 14 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- b. With the low-low set function of more than one of the above required reactor coolant system safety/relief valves inoperable, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.
- c. With either low-low set function pressure actuation trip system "A" or "B" inoperable, restore the inoperable trip system to OPERABLE status within 7 days; otherwise, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.4.2.2 The low-low set function pressure actuation instrumentation shall be demonstrated OPERABLE by performance of a:

- a. CHANNEL FUNCTIONAL TEST, including calibration of the trip unit, at least once per 92 days.
- b. CHANNEL CALIBRATION and LOGIC SYSTEM FUNCTIONAL TEST at least once per 18 months.

\*One channel may be placed in an inoperable status for up to 6 hours for the purpose of performing surveillance testing in accordance with Specification 4.4.2.2.

\*\*The lift setting pressure shall correspond to ambient conditions of the valves at nominal operating temperatures and pressures.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 94 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 August 12, 1994, Illinois Power Company the (the licensee) requested an amendment to Facility Operating License No. NPF-62 to revise Technical Specifications (TS) 3/4.3.1, "Reactor Protection System Instrumentation," TS 3/4.3.2, "Containment and Reactor Vessel Isolation Control System," TS 3/4.3.3, "Emergency Core Cooling System Actuation Instrumentation," TS 3/4.3.4.2, "End-of-Cycle Recirculation Pump Trip System Instrumentation," TS 3/4.3.5, "Reactor Core Isolation Cooling System Actuation Instrumentation," TS 3/4.4.2.1, "Safety/Relief Valves," and TS 3/4.4.2.2, "Safety/Relief Valves Low-Low Set Function." The above referenced TS contain requirements to perform manual testing of the associated solid state logic at least once every four fuel cycles on a staggered basis. These tests are in addition to the automatic testing performed by the self-test system. The proposed TS change removes the requirement to perform manual testing of the solid state logic when the automatic testing is already performed.

2.0 EVALUATION

The Clinton Power Station solid state logic design includes a computer-based self-test system (STS). The STS is a testing and surveillance system that is designed to continuously monitor system logic for the reactor protection, nuclear steam supply shutoff, automatic depressurization, high pressure core spray, low pressure core spray, residual heat removal and low pressure core injection, shutdown cooling, reactor core isolation cooling, end-of-cycle recirculation pump trip, and the relief and low-low set modes of the safety/relief valves.

The STS is a testing and surveillance subsystem that has the ability to continuously perform automatic testing of the nuclear safety protection system (NSPS) panel circuitry. The STS provides failure information such that failures can be traced to the module or circuit board level. The tests performed by the STS include logic system functional tests (LSFTs) and response time testing (RTT). The STS is also used to augment conventional testing methods when performing channel checks, functional tests and calibrations. The scope of the STS functional and RTT capability for the nuclear system protection system logic extends from the analog trip module to the actuated device load driver.

A combination of conventional tests and the STS tests are necessary to perform complete end-to-end testing of the NSPS. The present TS requires that parts of the NSPS be tested independent of the STS to verify the operability of the STS and confirm STS test results. The additional manual testing independent of the STS requires temporary system reconfiguration, and reduces system availability and component reliability. The licensee stated that this additional manual testing also results in increased potential for unintended equipment actuation during manual testing. The removal of the manual testing requirement will reduce the potential for unwanted actuation and is supported by successful performance of the self-test system during the plant pre-operational testing and the last four refueling outages. The licensee stated that the proposed change will result in a net increase in overall safety.

A review of STS operational history by the licensee shows that the pre-operational test program confirmed that no functional failures existed which should have been detected by the STS. A review by the licensee of the manual testing of the NSPS logic during each of the past four refueling outages, including all the NSPS logic automatically tested by the STS, confirmed that no functional failures were identified by manual testing that were not detected by the STS.

Based on the above, the licensee proposes to revise the TS to remove manual testing of the NSPS logic independent of the STS. The requirement to perform an LSFT every 18 months will not be revised.

With the absence of manual testing of the NSPS that verifies the operability of the STS, the importance of STS configuration management (both hardware and software) increases. The licensee should verify that the STS configuration plan makes provisions for software control, storage of hardware and software (including verification of marking or labeling) and the implementation of system changes or enhancements (including interface control). The licensee indicated that the STS is bounded by plant procedures that ensure continued configuration control of the STS. The staff finds this acceptable.

Based on the operating history test results, LSFT testing at 18-month intervals, the reduced potential for unwanted protection system actuation, the staff finds the proposed TS revision to remove the manual testing requirement of the STS to be 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 (59 FR 49428). 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: Cliff Doudt

Date: November 3, 1994