July 22, 1994

Docket No. 50-461

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SUBJECT: ISSUANCE OF AMENDMENT NO. 91 TO FACILITY OPERATING LICENSE NO. NPF-62 - CLINTON POWER STATION, UNIT 1 (TAC NO. M89326)

The U. S. Nuclear Regulatory Commission (Commission) has issued the enclosed Amendment No. 91 to Facility Operating License No. NPF-62 for the Clinton Power Station, Unit No. 1. The amendment is in response to your application dated April 18, 1994 (U-602243) as supplemented by letter dated June 16, 1994 (U-602302).

The amendment modifies Technical Specification Sections 3/4.6.6.3, "Standby Gas Treatment System," and 3/4.7.2, "Control Room Ventilation System," to update the version of the American Society for Testing and Materials (ASTM) Standard utilized to periodically perform laboratory testing of charcoal adsorber samples from the 1979 version of ASTM D3803 to the 1989 version. Technical Specification Bases Section 3/4.7.2, "Control Room Ventilation System," has also been modified to reference the correct ANSI standard.

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

Enclosures:
1. Amendment No. 91 to NPF-62
2. Safety Evaluation

cc w/enclosures:
see next page

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/12/94	6/29/94	06/27/94	7/22/94	6/29/94

DOCUMENT NAME: G:\CLINTON\TAC89326.AMD

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

July 22, 1994

Docket No. 50-461

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

Dear Mr. Phares:

SUBJECT: ISSUANCE OF AMENDMENT NO. 91 TO FACILITY OPERATING LICENSE NO. NPF-62 - CLINTON POWER STATION, UNIT 1 (TAC NO. M89326)

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

Sincerely,

Douglas V Pickett

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

Enclosures:
1. Amendment No. 91 to NPF-62
2. Safety Evaluation

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See next page

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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. 91
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 April 18, 1994, as supplemented by letter dated June 16, 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.

(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. 91 , are hereby incorporated into this license. Illinois Power Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

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

FOR THE NUCLEAR REGULATORY COMMISSION

Douglas V Pickett for

John N. Hannon, 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: July 22, 1994

ATTACHMENT TO LICENSE AMENDMENT NO. 91

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	Insert Pages
3/4 6-39	3/4 6-39
3/4 6-40*	3/4 6-40*
3/4 7-4	3/4 7-4
3/4 7-5	3/4 7-5
B 3/4 7-1	B 3/4 7-1

4.6.6.3 (Continued)

1. Verifying that the subsystem satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% and uses the test procedure guidance in Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978*, and the system flow rate is 4000 cfm ± 10%.

2. Verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978*, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978*, for a methyl iodide penetration of less than 0.175%; when tested in accordance with ASTM D3803-89 methods, with the following parameters:

   a) Bed Depth - 4 inches
   b) Velocity - 40 fpm
   c) Temperature - 30° C
   d) Relative Humidity - 70%

   and

3. Verifying a subsystem flow rate of 4000 cfm ± 10% during system operation when tested in accordance with ANSI N510-1980.

c. After every 720 hours of charcoal adsorber operation, by verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978*, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978*, for a methyl iodide penetration of less than 0.175%; in accordance with ASTM D3803-89 methods, with the following parameters:

   a) Bed Depth - 4 inches
   b) Velocity - 40 fpm
   c) Temperature - 30° C
   d) Relative Humidity - 70%

*ANSI N510-1980 shall be used in place of ANSI N510-1975 as referenced in Regulatory Guide 1.52, Revision 2, March 1978.

SURVEILLANCE REQUIREMENTS (Continued)

4.6.6.3 (Continued)

d. At least once per 18 months by:

1. Performing a system functional test which includes simulated automatic actuation of the system throughout its emergency operating sequence for the:

a) LOCA, and
b) Fuel handling accident.

2. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6.0 inches Water Gauge while operating the filter train at a flow rate of 4000 cfm ± 10%.

3. Verifying that the filter train starts and isolation dampers open on receipt of the following test signals:

a) Manual initiation from the control room, and
b) Simulated automatic initiation signal.

4. Verifying that the filter cooling bypass dampers can be manually opened and the fan can be manually started.

5. Verifying that the heaters dissipate at least 18.0 kW when tested in accordance with ANSI N510-1980.

e. After each complete or partial replacement of a HEPA filter bank, by verifying that the HEPA filter bank satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1980 while operating the system at a flow rate of 4000 cfm ± 10%.

f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorber bank satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1980 for a halogenated hydrocarbon refrigerant test gas while operating the system at a flow rate of 4000 cfm ± 10%.

SURVEILLANCE REQUIREMENTS (Continued)

4.7.2 (Continued)

c. At least once per 18 months or (1) after any structural maintenance on the makeup or recirculation HEPA filters or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the makeup or recirculation filter system by:

1. Verifying that the makeup filter system satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% and uses the test procedure guidance in Regulatory Positions C.5.a, C.5.c, and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978*, and the system flow rate is 3000 cfm ± 10%.

2. Verifying that the recirculation filter system satisfies bypass leakage testing acceptance criteria of less than 2% total bypass and uses test procedure guidance in Regulatory Positions C.5.a and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978*, and the system flow rate is 64,000 cfm ± 10%.

3. Verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978*, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978*, for a methyl iodide penetration of less than 0.175% for makeup filter system carbon adsorber and 6% for recirculation filter system carbon adsorber when tested; in accordance with ASTM D3803-89 methods, with the following parameters:

Make Up Filter System

a)	Bed Depth	- 4 inches
b)	Velocity	- 40 fpm
c)	Temperature	- 30°C
d)	Relative Humidity	- 70%

Recirculation Filter System

a)	Bed Depth	- 2 inches
b)	Velocity	- 80 fpm
c)	Temperature	- 30°C
d)	Relative Humidity	- 70%

4. Verifying flow rate of 3000 cfm ± 10% for the makeup filter system and 64,000 cfm ± 10% for the recirculation filter system during operation when tested in accordance with ANSI N510-1980.

*ANSI N510-1980 shall be used in place of ANSI N510-1975 as referenced in Regulatory Guide 1.52, Revision 2, March 1978.

SURVEILLANCE REQUIREMENTS (Continued)

4.7.2 (Continued)

d. After every 720 hours of charcoal adsorber operation, by verifying within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978*, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978*, for a methyl iodide penetration of less than 0.175% for the makeup filter system carbon adsorber and 6% for the recirculation filter system carbon adsorber when tested; in accordance with ASTM D3803-89 methods, with the following parameters:

Make Up Filter System

a) Bed Depth - 4 inches
b) Velocity - 40 fpm
c) Temperature - 30°C
d) Relative Humidity - 70%

Recirculation Filter System

a) Bed Depth - 2 inches
b) Velocity - 80 fpm
c) Temperature - 30°C
d) Relative Humidity - 70%

e. At least once per 18 months by:

1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6 inches Water Gauge while operating the makeup filter system at a flow rate of 3000 cfm ± 10%.

2. Verifying that on a high chlorine actuation** and a manual initiation test signal, the system automatically** switches to the chlorine mode of operation and the dampers close within 2 seconds.***

3. Verifying that the control room leak rate is limited to ≤ 4000 cfm ± 10% at ≥ 1/8-inch Water Gauge (W.G.) with respect to adjacent areas.

4. Verifying that on a smoke mode actuation test signal, the system automatically switches to the smoke mode of operation at a flow rate less than or equal to 64,000 cfm ± 10%.

5. Verifying that on a high radiation actuation test signal, the system automatically switches to the high radiation mode of operation and

*ANSI N510-1980 shall be used in place of ANSI N510-1975 as referenced in Regulatory Guide 1.52, Revision 2, March 1978.

**Automatic transfer to the chlorine mode is not required when chlorine containers having a capacity of 150 pounds or less are stored 100 meters from the control room or its fresh air inlets.

***This specification is not applicable after all chlorine containers having a capacity of 100 pounds or greater are removed from the site including the chlorine containers located at the site sewage treatment plant.

3/4.7.1 SHUTDOWN SERVICE WATER SYSTEM

The OPERABILITY of the shutdown service water system ensures that sufficient cooling capacity is available for continued operation of safety-related equipment during accident conditions. The redundant cooling capacity of these systems, assuming a single failure, is consistent with the assumptions used in the accident analyses within acceptable limits.

The ultimate heat sink (UHS) specification ensure that sufficient cooling capacity is available for continued operation of safety-related equipment for at least 30 days to permit safe shutdown and cooldown of the reactor. The surveillance requirements ensure that quantities maintained are consistent with the assumption used in the accident analysis as described in the USAR and the guidance provided in Regulatory Guide 1.27, January 1976.

3/4.7.2 CONTROL ROOM VENTILATION SYSTEM

The OPERABILITY of the control room ventilation system ensures that 1) the ambient air temperature does not exceed the allowable temperature for continuous duty rating for the equipment and instrumentation cooled by this system and 2) the control room will remain habitable for operations personnel during and following all design basis accident conditions. The OPERABILITY of this system in conjunction with control room design provisions is based on limiting the radiation exposure to personnel occupying the control room to 5 rem or less whole body, or its equivalent. This limitation is consistent with the requirements of General Design Criterion 19 of Appendix "A", 10 CFR 50. Surveillance testing provides assurance that system and component performances continue to be in accordance with performance specifications for Clinton Unit 1, including applicable parts of ANSI N510-1980. Continuous operation of the system with the heaters OPERABLE for 10 hours during each 31 day period is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters. The specified heater dissipation is based on a bus voltage of 460 volts. Heater test results shall be adjusted to account for actual bus voltage.

3/4.7.3 REACTOR CORE ISOLATION COOLING SYSTEM

The reactor core isolation cooling (RCIC) system is provided to assure adequate core cooling in the event of reactor isolation from its primary heat sink and the loss of feedwater flow to the reactor vessel without requiring actuation of any of the Emergency Core Cooling System equipment. The RCIC system is conservatively required to be OPERABLE whenever reactor pressure exceeds 150 psig. This pressure is substantially below that for which the low pressure core cooling systems can provide adequate core cooling for events requiring the RCIC system.

The RCIC system specifications are applicable during OPERATIONAL CONDITIONS 1, 2, and 3 when reactor vessel pressure exceeds 150 psig because RCIC is the primary (non-ECCS) source of emergency core cooling when the reactor is pressurized.

With the RCIC system inoperable, adequate core cooling is assured by the OPERABILITY of the HPCS system and justifies the specified 14 day out-of-service period.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 91 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

The design of both the Control Room Ventilation System and the Standby Gas Treatment System includes charcoal filter beds that are used to reduce airborne radioactive fission products following an accident. The Control Room Ventilation System is designed to protect control room operators while the Standby Gas Treatment System is designed to reduce iodine and particulate concentrations in gases leaking from the primary containment that would potentially be present in the secondary containment.

Charcoal filters normally found in ventilation systems accumulate contaminates over time and must be periodically replaced. Technical Specifications require periodic testing to verify the effectiveness of the charcoal filters to remove radioiodine. Technical Specifications 3/4.6.6.3, "Control Room Ventilation System," and 3/4.7.2, "Standby Gas Treatment System," require testing at least once every 18 months or after any structural maintenance on the HEPA filter or charcoal adsorber housings, or following painting, fire, or chemical release in any ventilation zone communicating with the ventilation system. In addition, testing must be performed after every 720 hours of charcoal adsorber operation. The specifications describe how the samples are to be obtained, the test methods to be used, and the final acceptance criteria.

Current Technical Specifications at the Clinton Power Station require that the testing methods be performed in accordance with the American Society for Testing and Materials (ASTM) Standard D-3803-1979, "Standard Methods for Radioiodine Testing of Nuclear-Grade Gas-Phase Adsorbents." This standard is also referred to as ASTM D3803-79.

ASTM D3803-79 was the subject of NRC Information Notice (IN) 87-32, "Deficiencies in the Testing of Nuclear-Grade Activated Charcoal," issued on July 10, 1987. It was reported that the ASME Committee on Nuclear Air and Gas Treatment conducted an interlaboratory comparison and found that seven U.S. and eight foreign testing companies obtained vastly differing results from testing samples of the same charcoal. IN 87-32 described serious deficiencies in ASTM D3803-79 along with problems with the capabilities of the testing companies. Finally, it was stated that a new testing protocol had been developed and that the standard was being revised.

The licensee's initial evaluation of IN 87-32 did not indicate a need to change their testing methods. However, an NRC inspection report at the Clinton Power Station conducted in November 1991 identified a significant amount of "data scatter" in test results. Rather than showing a gradual decline in the effectiveness of the charcoal's ability to remove radioiodine, the test results indicated that the charcoal adsorbers had actually improved over time. As a result of this finding, Illinois Power committed to reevaluate IN 87-32. Part of this revaluation was a review of the ASTM standard D3803 which was revised in 1989 to become ASTM D3803-89.

By letter dated April 18, 1994, the licensee requested a change to the Technical Specifications to allow use of the test methods found in ASTM D3803-89. However, rather than specifying the year of the standard, the licensee requested to delete reference to the year. By referencing "ASTM D3803" as opposed to "ASTM D3803-89," the licensee would have the flexibility of incorporating future revisions to the standard without the need of modifying the Technical Specifications.

2.0 EVALUATION

The ASTM standard D3803 was revised in 1989 to address deficiencies identified in IN 87-32. Changes to the standard included increased accuracies for testing and measuring equipment and adding a requirement to "equilibrate" samples prior to testing. The equilibration, in conjunction with the use of more efficient backup beds for collection of the methyl iodide passing through the test bed and use of more accurate measuring equipment, provides more accurate and repeatable test results.

The test methodology for ASTM D3803-79 included the following steps for the methyl iodide penetration test. The charcoal test bed is initially brought to the specified temperature without any air flow. Once the specified temperature for the test bed is reached, a 60 minute "feed period" is initiated using a mixture of air and methyl iodide. After the feed period is complete, air flow without methyl iodide is continued under the same controlled temperature and humidity conditions for an additional 240 minute "elution period." Throughout the test, the effluent from the test bed passes through a backup bed having a known high efficiency for removal of methyl iodide. The backup bed, which traps essentially all of the remaining methyl iodide, is measured by a gamma counter following the elution period. The bed-depth penetration is ultimately calculated based on the ratio of the activity trapped in the backup bed to the combined activity trapped in the test and backup beds.

The major changes to the test methodology of ASTM D3803-89 include the following. Prior to the feed period, a 16 hour "pre-equilibration period" has been introduced which consists of purge air at the specified temperature and humidity. This is then followed by a two hour "equilibration period" which, in turn, is followed by a 60 minute feed period and a 60 minute elution period. The two equilibration periods ensure that all samples have a common

starting point before introducing the methyl iodide flow. In addition, the 1989 version requires redundant high efficiency backup beds. These changes, along with the more accurate measuring instrumentation, ensure more accurate and repeatable test results.

Previous charcoal test data taken at the Clinton facility has yielded questionable results. The test data does not always identify a gradual decline in the effectiveness of the charcoal filters to remove radioiodines. ASTM D3803-89 was developed to correct the anomalous results of ASTM D3803-79 and should significantly improve the test results.

The licensee's letter stated their intention to adopt the provisions of ASTM D3803-89. However, their proposal simply replaced all references to D3803-79 with a generic reference to the standard without specifying a year. Such a change would permit the licensee to incorporate future revisions to the standard through the change control provisions of 10 CFR 50.59.

The staff had two objections to the licensee's proposal. The first objection was the generic reference to the ASTM standard. Typically the staff requires plant Technical Specifications to reference the year of the standard. This prevents the use of future revisions that have not been previously reviewed and approved by the staff. Second, the 1989 version of ASTM D3803 strictly specifies a test temperature of 30 °C. This is a change from the 1979 version of the standard and reflects the finding that testing at temperatures above 30 °C is not sufficiently conservative for predicting charcoal performance during accident conditions.

In response to the staff's concerns, the licensee modified their proposal in a letter dated June 16, 1994. This most recent letter references the 1989 version of the ASTM standard and specifies the test temperature for all charcoal filters to be 30 °C. The staff has determined the licensee's proposal to be consistent with the staff's position on charcoal filter testing and, therefore, acceptable.

Bases Section 3/4.7.2, "Control Room Ventilation System," states that periodic surveillance testing will be performed to provide assurance that system and component performance continues to meet design specifications and applicable parts of ANSI N509-1980. The licensee has indicated that the reference to ANSI N509-1980 is inappropriate because the standard addresses installation acceptance criteria. Therefore, the licensee has proposed to replace the reference to ANSI N509-1980 with a reference to ANSI N510-1980, which refers to periodic testing. While the Bases section is not part of the technical specifications as defined by 10 CFR 50.36, the staff finds the proposed change 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. 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 hazards consideration and there has been no public comment on such finding (59 FR 24750). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Douglas V. Pickett

Date: July 22, 1994