

RS-06-077

10 CFR 50.90

May 19, 2006

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

Subject: Clarification of Commitments Supporting the Request for License Amendment Related to Extending the Completion Time for Nuclear System Protection System Inverters

- References:**
1. Letter from Keith R. Jury (AmerGen Energy Company, LLC) to U. S. NRC, "Request for Technical Specification Change to Extend Completion Time for Nuclear System Protection System Inverters," dated April 26, 2004
 2. Letter from Keith R. Jury (AmerGen Energy Company, LLC) to U. S. NRC, "Additional Information Supporting the Request for License Amendment Related to Extending the Completion Time for Nuclear System Protection System Inverters," dated April 18, 2005
 3. Letter from Keith R. Jury (AmerGen Energy Company, LLC) to U. S. NRC, "Additional Information Supporting the Request for License Amendment Related to Extending the Completion Time for Nuclear System Protection System Inverters," dated October 11, 2005

In Reference 1, AmerGen Energy Company, LLC (AmerGen) requested an amendment to the facility operating license for Clinton Power Station (CPS), Unit 1. The proposed change is requested to revise the Completion Time for Required Action A.1 of Technical Specification (TS) 3.8.7, "Inverters - Operating," from the current 24 hours to 7 days for an inoperable Division 1 or 2 Nuclear System Protection System (NSPS) inverter. References 2 and 3 provided additional information requested by the NRC to support their review of Reference 1.

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On May 12, 2006, the NRC requested that AmerGen provide clarification on the regulatory commitments made in References 2 and 3 to support approval of the proposed license amendment. Specifically, AmerGen was asked to identify the documents that will be revised to incorporate the regulatory commitments made in References 2 and 3. This request was provided by telephone call from Kahtan N. Jabbour (U. S. NRC) to Timothy A. Byam (AmerGen) and this letter provides the requested information.

As stated in Attachment 3 to Reference 2, TS Bases 3.8.7 and applicable procedures will be revised to reflect the evaluations AmerGen committed to complete as part of the risk management program. In addition, Attachment 3 also documented the AmerGen commitment to revise TS Bases section 3.8.7 to incorporate specific compensatory actions that should be taken when a Division 1 or 2 NSPS inverter is inoperable.

Reference 3 also contained three regulatory commitments as documented in Attachment 2 to that letter. While Attachment 2 identified the specific regulatory commitments it did not identify the documents that would be revised to reflect these commitments. Each of the regulatory commitments identified in Reference 3 will be incorporated as follows.

1. During Modes 1,2 and 3, should the Division 1 NSPS inverter be removed from service for more than 24 hours, then, within 24 hours of removal from service specified actions will be performed. This commitment will be incorporated into the appropriate CPS procedure(s).
2. When the Division 1 NSPS inverter is unavailable the specified compensatory actions will be taken. The TS Bases section 3.8.7 and applicable procedure(s) will be revised to reflect the need to take these compensatory actions.
3. When either Division 1 or 2 NSPS inverter is unavailable the specified compensatory action will be taken. TS Bases section 3.8.7 and applicable procedure(s) will be revised to reflect the need to take the specified compensatory action.

There are no additional regulatory commitments contained in this letter.

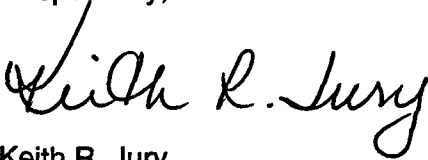
AmerGen has reviewed the information supporting a finding of no significant hazards consideration that was previously provided to the NRC in Reference 1. The additional information provided in this submittal simply provides clarification and does not affect the bases for concluding that the proposed license amendment does not involve a significant hazards consideration.

If you have any questions concerning this letter, please contact Mr. Timothy A. Byam at (630) 657-2804.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on the 19th day of May 2006.

Respectfully,

A handwritten signature in black ink that reads "Keith R. Jury". The signature is written in a cursive style with a large initial "K" and a long, sweeping underline.

Keith R. Jury
Director – Licensing and Regulatory Affairs
AmerGen Energy Company, LLC