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RS-08-081

10 CFR 50.90

June 27, 2008

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: Additional Information Supporting the Request for a License Amendment to Revise Local Power Range Monitor Calibration Frequency
- References: 1. Letter from Mr. K. R. Jury (AmerGen Energy Company, LLC) to U. S. NRC, "Request for a License Amendment to Revise Local Power Range Monitor Calibration Frequency," dated December 12, 2006
  - Letter from U. S. NRC to Mr. C. M. Crane (AmerGen Energy Company, LLC), "Clinton Power Station, Unit No. 1 – Request for Additional Information Related to Revision of Local Power Range Monitor Calibration Frequency (TAC No. MD3795)," dated September 20, 2007
  - Letter from Mr. D. M. Benyak, (AmerGen Energy Company, LLC) to U. S. NRC, "Additional Information Supporting the Request for a License Amendment to Revise Local Power Range Monitor Calibration Frequency," dated November 16, 2007
  - Letter from U. S. NRC to Mr. C. G. Pardee (Exelon Generation Company, LLC), "Clinton Power Station, Unit No. 1 – Request for Additional Information Related to License Amendment Request to Revise Local Power Range Monitor Calibration Frequency (TAC No. MD3795)," dated February 28, 2008
  - Letter from Mr. D. M. Benyak (AmerGen Energy Company, LLC) to U. S. NRC, "Additional Information Supporting the Request for a License Amendment to Revise Local Power Range Monitor Calibration Frequency," dated May 16, 2008

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- Letter from U. S. NRC to Mr. C. G. Pardee (AmerGen Energy Company, LLC), " Clinton Power Station, Unit No. 1 – Letter Documenting the Tele-Conference Regarding License Amendment to Revise Local Power Range Monitor Calibration Frequency (TAC No. MD3795)," dated June 26, 2008
- Letter from U. S. NRC to Mr. C. G. Pardee (Exelon Generation Company, LLC), "Peach Bottom Atomic Power Station, Units 2 and 3 – Issuance of Amendments to Extend Local Power Range Monitor Calibration Interval (TAC Nos. MD3717 and MD3718)," dated February 29, 2008

In Reference 1, AmerGen Energy Company, LLC (AmerGen) requested an amendment to the facility operating license for Clinton Power Station (CPS), Unit 1. Specifically, the proposed changes will revise Technical Specification (TS) Surveillance Requirement (SR) 3.3.1.1.8 and SR 3.3.1.3.2 to increase the interval between Local Power Range Monitor (LPRM) calibrations from 1000 megawatt-days per short ton (MWD/T) average core exposure to 2000 MWD/T average core exposure. In Reference 2, the NRC requested that AmerGen provide additional information in support of their review of Reference 1. Reference 3 provided the requested information. Following their review of the responses provided in Reference 3, the NRC identified, in Reference 4, additional information that was required to support their review of Reference 1. The requested information was provided in Reference 5.

In Reference 5, AmerGen documented that, for the current cycle (i.e., Cycle 12), doubling the LPRM update uncertainty had an insignificant impact in the Safety Limit Minimum Critical Power Ratio (SLMCPR) when compared to SLMCPR calculations using the original LPRM update uncertainty. This evaluation supports the proposed extension of the LPRM calibration interval to 2000 MWD/T for Cycle 12. The NRC, in Reference 6, documented a teleconference between AmerGen and the NRC in which AmerGen made a commitment to double the LPRM update uncertainty value for calculation of the SLMCPR specified in NEDC-32694P-A, "Power Distribution Uncertainties for Safety Limit MCPR Evaluations," for future cycles with a surveillance interval of 2000 MWD/T. This commitment is similar to the commitment agreed to by Peach Bottom Atomic Power Station, Units 2 and 3, as approved in their license amendment dated February 29, 2008 (Reference 7). Therefore, AmerGen formally commits to doubling the LPRM update uncertainty value when calculating the SLMCPR for future operating cycles using an LPRM calibration surveillance interval of 2000 MWD/T beginning with Cycle 13. This regulatory commitment is documented in the Attachment to this letter. The original LPRM update uncertainty value can continue to be utilized for future cycles during which the LPRM calibration surveillance interval is maintained at 1000 MWD/T.

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 27<sup>th</sup> day of June 2008.

Respectfully,

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Darin M. Benyak Director, Licensing and Regulatory Affairs AmerGen Energy Company, LLC

Attachment: Summary of Commitments

## ATTACHMENT

## SUMMARY OF COMMITMENTS

The following table identifies commitments made in this document. Any other statements discussed in the submittal represent intended or planned actions. They are described to the NRC for the NRC's information and are not regulatory commitments.

COMMITMENT	COMMITTED DATE OR "OUTAGE"	COMMITMENT TYPE	
		ONE-TIME ACTION (Yes /No)	PROGRAMMATIC (Yes/No)
Clinton Power Station will double the LPRM update uncertainty that is specified in NEDC-32694P-A, "Power distribution Uncertainties for Safety Limit MCPR Evaluations," when calculating the Safety Limit Minimum Critical Power Ratio (SLMCPR) for future operating cycles using an LPRM calibration interval of 2000 MWD/T beginning with Cycle 13.	Upon implementation of the approved TS change	No	Yes