

Clinton Power Station
8401 Power Road
Clinton, IL 61727



Exelon Generation®

U-604355
July 3, 2017

10CFR50.73
SRRS 5A.108

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

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

Subject: Licensee Event Report 2017-003-00

Enclosed is Licensee Event Report (LER) 2017-003-00: Implementation of Enforcement Guidance Memorandum (EGM) 11 - 003, Revision 3. This report is being submitted in accordance with the requirements of 10 CFR 50.73. There are no regulatory commitments contained in this report.

Should you have any questions concerning this report, please contact Mr. Dale Shelton, Regulatory Assurance Manager, at (217) 937-2800.

Respectfully,

A handwritten signature in black ink, appearing to read 'T. Stoner'.

Theodore R. Stoner
Site Vice President
Clinton Power Station

BRADLEY T. KAPSLAS FOR TED STONER

KP/bsz

Attachment: Licensee Event Report 2017-003-00

cc:

Regional Administrator— NRC Region III
NRC Senior Resident Inspector - Clinton Power Station
Office of Nuclear Facility Safety — Illinois Emergency Management Agency

TEZZ
NRR



LICENSEE EVENT REPORT (LER)

(See Page 2 for required number of digits/characters for each block)

(See NUREG-1022, R.3 for instruction and guidance for completing this form
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1022/r3/>)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Information Services Branch (T-2 F43), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

1. FACILITY NAME

Clinton Power Station, Unit 1

2. DOCKET NUMBER

05000461

3. PAGE

1 OF 4

4. TITLE

Implementation of Enforcement Guidance Memorandum (EGM) 11 - 003, Revision 3

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER	
05	09	2017	2017	003	00	07	03	2017		05000	
9. OPERATING MODE										11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)	
5			<input type="checkbox"/> 20.2201(b)			<input type="checkbox"/> 20.2203(a)(3)(i)			<input type="checkbox"/> 50.73(a)(2)(ii)(A)		<input type="checkbox"/> 50.73(a)(2)(viii)(A)
			<input type="checkbox"/> 20.2201(d)			<input type="checkbox"/> 20.2203(a)(3)(ii)			<input type="checkbox"/> 50.73(a)(2)(ii)(B)		<input type="checkbox"/> 50.73(a)(2)(viii)(B)
			<input type="checkbox"/> 20.2203(a)(1)			<input type="checkbox"/> 20.2203(a)(4)			<input type="checkbox"/> 50.73(a)(2)(iii)		<input type="checkbox"/> 50.73(a)(2)(ix)(A)
			<input type="checkbox"/> 20.2203(a)(2)(i)			<input type="checkbox"/> 50.36(c)(1)(i)(A)			<input type="checkbox"/> 50.73(a)(2)(iv)(A)		<input type="checkbox"/> 50.73(a)(2)(x)
			<input type="checkbox"/> 20.2203(a)(2)(ii)			<input type="checkbox"/> 50.36(c)(1)(ii)(A)			<input type="checkbox"/> 50.73(a)(2)(v)(A)		<input type="checkbox"/> 73.71(a)(4)
10. POWER LEVEL			<input type="checkbox"/> 20.2203(a)(2)(iii)			<input type="checkbox"/> 50.36(c)(2)			<input type="checkbox"/> 50.73(a)(2)(v)(B)		<input type="checkbox"/> 73.71(a)(5)
			<input type="checkbox"/> 20.2203(a)(2)(iv)			<input type="checkbox"/> 50.46(a)(3)(ii)			<input type="checkbox"/> 50.73(a)(2)(v)(C)		<input type="checkbox"/> 73.77(a)(1)
			<input type="checkbox"/> 20.2203(a)(2)(v)			<input type="checkbox"/> 50.73(a)(2)(i)(A)			<input type="checkbox"/> 50.73(a)(2)(v)(D)		<input type="checkbox"/> 73.77(a)(2)(i)
			<input type="checkbox"/> 20.2203(a)(2)(vi)			<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)			<input type="checkbox"/> 50.73(a)(2)(vii)		<input type="checkbox"/> 73.77(a)(2)(ii)
			<input type="checkbox"/> 50.73(a)(2)(i)(C)			<input type="checkbox"/> OTHER			Specify in Abstract below or in NRC Form 366A		

12. LICENSEE CONTACT FOR THIS LER

LICENSEE CONTACT Dale A. Shelton, Regulatory Assurance Manager	TELEPHONE NUMBER (Include Area Code) 217-937-2800
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13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED

YES (If yes, complete 15. EXPECTED SUBMISSION DATE) NO

15. EXPECTED SUBMISSION DATE

MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

The condition reported by this LER is the result of planned activities in support of Refueling Outage C1R17 at Clinton Power Station (CPS). As described in the LER, the NRC provided enforcement guidance, applicable to boiling water reactor licensees, that addresses the reported condition. Although this allowance is provided by the NRC's enforcement guidance, the planned activities are still considered reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications (TS). On May 9 through May 28, 2017 CPS performed Operations with the Potential for Draining the Reactor Vessel (OPDRV) activities while in Mode 5 without an operable Secondary Containment. These activities were performed within the guidelines of NRC Enforcement Guidance Memorandum (EGM) 11-003, Revision 3 which allows the implementation of interim actions as an alternative to full compliance, provided several conditions are met. The OPDRV activities were planned activities that were completed following the guidance of the EGM and are considered to have low safety significance based on interim actions taken. Since these actions were preplanned, no cause determination was necessary. As required by the EGM, a license amendment request was submitted on May 1, 2017 which follows the guidance in Technical Specifications Task Force traveler TSTF-542 which is the agreed-upon generic resolution of this issue.



**LICENSEE EVENT REPORT (LER)
CONTINUATION SHEET**

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1. FACILITY NAME	2. DOCKET NUMBER	3. LER NUMBER		
		YEAR	SEQUENTIAL NUMBER	REV NO.
Clinton Power Station, Unit 1	05000461	2017	- 003	- 00

NARRATIVE

PLANT AND SYSTEM IDENTIFICATION

General Electric—Boiling Water Reactor, 3473 Megawatts Thermal Rated Core Power Energy Industry Identification System (EIIS) codes are identified in the text as [XX]

EVENT IDENTIFICATION

Implementation of Enforcement Guidance Memorandum (EGM) 11-003, Revision 3

A. Plant Operating Conditions before the Event

Unit: 1	Event Date: May 9, 2017	Event Time: 2320
Mode: 5	Mode Name: Refueling	Reactor Power: 00 percent

B. DESCRIPTION OF EVENT

While in Mode 5, Refueling, Operations with the Potential for Draining the Reactor Vessel (OPDRV) activities were performed as part of the Unit 1 C1R17 Refueling Outage without an operable Secondary Containment (SC). The event timeline is presented as follows:

May 9, 2017 at 2320 - Commenced OPDRV activities under the provisions of EGM 11-003, Revision 3.

May 9, 2017 to May 28, 2017 - Performed OPDRV activities in support of Refueling Outage C1R17.

The station used the provisions of EGM 11-003, Revision 3 to perform the following outage activities:

- Shifting Residual Heat Removal (RHR) B in shutdown cooling to the upper pools. [BO]
- Isolating, draining and filling Reactor Recirculation Loops A and B [AD]
- Intermediate Range Monitor dry tube replacement [IG]
- Repairing jet pump flow transmitter
- Reactor Water Cleanup System (RT) pump startup and RT system letdown [CE]
- Starting and aligning RHR A for shutdown cooling to the Feedwater (FW) -'A' line and 'A' upper pool return line [SJ]



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NARRATIVE

- Perform maintenance on Control Rod Drive Hydraulic Control Units
- Shift from RHR A to RHR B shutdown cooling

C. CAUSE OF EVENT

Implementation of EGM 11-003, Revision 3 interim actions during the C1R17 Refueling Outage was a preplanned activity. As such, no cause determination was performed for these events.

D. SAFETY ANALYSIS

There were no safety consequences associated with the condition described in this report. This event is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as an operation prohibited by CPS Technical Specification (TS) 3.6.4.1, Secondary Containment, which prohibits performing activities identified as OPDRVs in Mode 5 with SC inoperable.

The OPDRV activities described in this report were accomplished using the interim actions provided by the NRC in EGM 11-003, Revision 3. CPS adhered to the NRC plain language meaning of OPDRV activities that could potentially result in draining or siphoning the Reactor Pressure Vessel (RPV) water level below the top of the fuel. This included evolutions involving aligning and realigning plant systems prior to achieving steady-state water level control, without taking credit for mitigating measures. CPS also met the requirements which specify the minimum makeup flow rate and water inventory. Further, an adequate defense in depth was maintained to minimize the potential for the release of fission products with SC inoperable. Since these measures were implemented, an adequate level of safety was provided during the performance of the OPDRV activities described in this report.

E. CORRECTIVE ACTIONS

On May 1, 2017, CPS submitted a license amendment request following the NRC approved guidance in Technical Specification Task Force traveler (TSTF)-542, Revision 2, Reactor Pressure Vessel Water Inventory Control. The proposed change replaces existing TS requirements related to OPDRVs with new requirements on RPV inventory control to protect TS Safety Limit 2.1.1.3.



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NARRATIVE

F. PREVIOUS SIMILAR OCCURENCES

LER 2013-006-00: Implementation of Enforcement Guidance Memorandum (EGM) 11-03, Revision 1

Between October 13, 2013 and October 27, 2013, CPS performed OPDRV activities while in Mode 5 without an operable SC, as expected and allowed by NRC EGM 11-003, Revision 1. This was reportable as a condition prohibited by TS as SC was inoperable during OPDRV activities. These activities were concluded successfully during Refueling Outage C1R14 with no resulting safety consequences.

LER 2015-002: Implementation of Enforcement Guidance Memorandum (EGM) 11-03, Revision 2.

Between April 29, 2015, and May 12, 2015, CPS performed OPDRV activities while in Mode 5 without an operable SC, as expected and allowed by NRC EGM 11-003, Revision 2. This was a condition prohibited by TS 3.6.4.1 and is reportable under 10 CFR 50.73 (a)(2)(i)(B). These activities were completed successfully during Refueling Outage C1R15.

LER 2016-008: Implementation of Enforcement Guidance Memorandum (EGM) 11-03, Revision 3.

Between May 18, 2016, and May 23, 2016, CPS performed OPDRV activities while in Mode 5 without an operable SC, as expected and allowed by NRC EGM 11-003, Revision 3. This was a condition prohibited by TS 3.6.4.1 and is reportable under 10 CFR 50.73 (a)(2)(i)(B). These activities were completed successfully during Refueling Outage C1R16.

G. COMPONENT FAILURE DATA

There were no CPS component failures associated with this event.