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ILLINOIS POWER COMPANY



CLINTON POWER STATION, P.O. BOX 678, CLINTON, ILLINOIS 61727

JSP-0070-90
January 26, 1990
10CFR50.90

Docket No. 50-461

Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Subject: Clinton Power Station
Proposed Amendment of Facility
Operating License No. NPF-62

Dear Sir:

Pursuant to 10CFR50.90, Illinois Power Company (IP) hereby applies for an amendment of Facility Operating License No. NPF-62 for Clinton Power Station (CPS). The proposed amendment (see Attachment 2 to this letter) consists of proposed changes to the CPS Technical Specifications (TS) which are requested collectively in response to Generic Letter 89-01 (Subject/Title: Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS [Radiological Effluent Technical Specifications] to the Offsite Dose Calculation Manual or to the Process Control Program).

The proposed amendment (Attachment 2) was prepared in accordance with the guidance provided in Generic Letter 89-01 (including Enclosures 1, 2, 3 and 4 of the Generic Letter). Accordingly, the proposed amendment will (1) incorporate programmatic controls in the Administrative Controls section of the Technical Specifications that satisfy the requirements of 10CFR20.106, 40CFR Part 190, 10CFR50.36a, and Appendix I to 10CFR Part 50, (2) relocate the existing procedural details or specific requirements in the current Technical Specifications involving radioactive effluent monitoring instrumentation, the control of liquid and gaseous effluents, equipment requirements for liquid and gaseous effluents, radiological environmental monitoring, and radiological reporting details from the TS to the Offsite Dose Calculation Manual (ODCM), (3) relocate the

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definition of solidification and existing procedural details or specific requirements in the current Technical Specification on solid radioactive wastes to the Process Control Program (PCP), (4) simplify the associated reporting requirements, (5) simplify the administrative controls for changes to the ODCM and PCP, (6) add record retention requirements for changes to the ODCM and PCP, and (7) update the definitions of the ODCM and PCP consistent with these changes (or ensure that the current definitions are acceptable).


Enclosure 1 of Generic Letter 89-01 notes that licensees should confirm in the amendment request that changes for relocating the procedural details of current RETS to either the ODCM or PCP have been prepared in accordance with the proposed changes to the Administrative Controls section of the TS so that they may be implemented immediately upon issuance of the proposed amendment. It further notes that a complete and legible copy of the revised ODCM should be forwarded with the amendment request. Pursuant to these recommendations, IP asserts that the relocation of procedural details or specific requirements from the TS to the ODCM and/or PCP is consistent with the revised Administrative Controls section of the TS as proposed. A copy of the revised ODCM is provided in Attachment 3 to this letter.

IP requests a 90-day grace period (that would make the amendment effective 90 days from issuance) to facilitate the transition from implementing Technical Specification-related requirements to implementing PCP/ODCM-related requirements. Although the ODCM and PCP have been revised (with the appropriate changes incorporated), IP is currently working to develop the programmatic and administrative changes needed to support implementation of the ODCM and PCP as revised. This work includes training of personnel, revising administrative-type procedures, reassigning divisions of responsibility, etc., and is being performed in accordance with a preplanned schedule. The schedule is based on the NRC's issuance of an approved amendment within 6 months after receipt of this application for amendment followed by a 90-day grace period.

Regarding the changes proposed in Attachment 2 of this letter, IP has reviewed these changes against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, or significantly increase the amounts or change the types of effluents that may be released offsite, nor do they significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, IP concludes that the proposed Operating License changes meet the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.

An affidavit supporting the facts set forth in this letter and its attachments is provided in Attachment 1.

Sincerely yours,


J. S. Perry
Vice President

TBE/krm

Attachments

cc: Regional Administrator, Region III, USNRC
NRC Clinton Licensing Project Manager
NRC Resident Office
Illinois Department of Nuclear Safety

STATE OF ILLINOIS
COUNTY OF DEWITT

J. Stephen Perry, being first duly sworn, deposes and says:
That he is Vice President of Illinois Power Company; that
the application for amendment of Facility Operating License
NPF-62 has been prepared under his supervision and
direction; that he knows the contents thereof; and that to
the best of his knowledge and belief said application and
the facts contained therein are true and correct.

DATED: This 26 day of January 1990

Signed: _____

J. Stephen Perry
J. Stephen Perry

Subscribed and sworn to before me this 26th day of
January 1990.

Linda S. French

Notary Public

My Commission Expires:

9-1-92

