

## UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

# SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION RELATED TO AMENDMENT NO. 87 TO FACILITY OPERATING LICENSE NO. NPF-62

ILLINOIS POWER COMPANY

SOYLAND POWER COOPERATIVE, INC.

CLINTON POWER STATION, UNIT NO. 1

DOCKET NO. 50-461

#### 1.0 INTRODUCTION

Technical Specification Surveillance Requirement 4.8.1.1.2.e.1 requires that at least once per 18 months, during plant shutdown, each diesel generator be subjected to an inspection in accordance with the manufacturer's recommendations. In a letter dated November 4, 1993, the licensee proposed deleting this requirement from the Clinton Power Station Technical Specifications and relocating it to the preventive maintenance program.

#### 2.0 EVALUATION

Inspecting diesel generators in accordance with the manufacturer's recommendations is common industry practice and has typically been included as a requirement in technical specifications. By relocating the inspection requirements from the technical specifications to the Clinton preventive maintenance program, the licensee states that the diesel generators will continue to function as designed and will continue to be tested as before.

The staff has previously considered the relocation of this surveillance requirement from the technical specifications and found it acceptable. In the staff's improved Standard Technical Specifications for BWR/6 facilities (NUREG-1434), the requirement to inspect the diesel generators in accordance with the manufacturer's recommendations is not specifically included. Instead, such inspections are assumed to occur within the plant's preventive maintenance program.

In addition, the staff concluded that these inspection and testing provisions could be relocated to the maintenance program because sufficient surveillance requirements are retained in the technical specifications to demonstrate the functional capability of the diesel generators. However, it was not the staff's intent that such inspections and related testing should be routinely conducted during power operation.

Routinely performing these inspections would increase the unavailability of the diesel generators during these modes. Although the technical specifications provide an allowed outage time for inoperable diesel generators, the licensee has not provided an analysis that demonstrates that there is a net safety benefit to be gained by performing these inspections during the operating modes. Nevertheless, the staff understands that a number of the diesel generator inspections will become due prior to the next scheduled refueling outage for Clinton, and the risk of shutting the plant down solely to perform these inspections would likely be greater than performing the inspections during power operation.

The staff concludes that relocating the provisions of Surveillance Requirement 4.8.1.1.2.e.l to the maintenance program is acceptable because these inspections are not necessary to ensure the functional capability of the diesel generators. However, in the future, the licensee should strive to perform diesel inspections during plant shutdown conditions when the reactor decay heat loads are low and the reactor coolant system inventory is high, or otherwise evaluate the disesel inspection and maintenance schedule to minimize the overall risk of removing a diesel generator from service.

#### 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 or changes a surveillance requirement. 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 (58 FR 64610). 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.

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### 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.

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Date: January 31, 1994