

ILLINOIS POWER

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

U-601738
L47-90(12-20)-LP
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JSP-0982-90
December 20, 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:

By letter dated August 31, 1990 (reference U-601730), Illinois Power (IP) applied for amendment of Facility Operating License No. NPF-62, Appendix A - Technical Specifications, for Clinton Power Station (CPS). That request consisted of proposed changes to the neutron monitoring function requirements of Technical Specifications 3/4.3.1, "Reactor Protection System Instrumentation"; 3/4.3.6, "Control Rod Block Instrumentation"; and 3/4.3.7.6, "Source Range Monitors." Included in these proposed changes was a proposed statement of exception to the provisions of Technical Specification 4.0.4 for surveillance requirements pertaining to the source range monitor (and intermediate range monitor) functions under Technical Specification 3/4.3.6.

Subsequent to IP's submittal, it was identified that the applicable Operational Conditions for the noted proposed exception to the provisions of Technical Specification 4.0.4 did not precisely agree with the applicable Operational Conditions specified for the source range monitor function Surveillance Requirements. Therefore, this revision is being submitted to correctly identify the Operational Condition for which the proposed exception to Technical Specification 4.0.4 is applicable in relation to the surveillance requirements for the source range monitor functions under Technical Specification 3/4.3.6.

As identified in IP's August 31, 1990 request, the proposed exception to the provisions of Technical Specification 4.0.4 is only applicable during plant shutdowns following extended operation in Operational Condition 1 such that the required intermediate range monitor (IRM) and source range monitor (SRM) surveillances cannot be maintained current. (The IRMs and SRMs are not required to be operable in Operational Condition 1.) During plant operation in Operational Condition 1, the IRMs and SRMs are withdrawn in order to prolong their life. Under these conditions, entry into Operational Condition 2 (reactor mode

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switch in the STARTUP/HOT STANDBY position) is required in order to perform the required IRM Channel Functional testing. Therefore, IP proposed the exception to the provisions of Technical Specification 4.0.4 for the IRM functions to allow entry into Operational Condition 2 under these conditions.

As stated above, the SRMs are fully withdrawn during plant operation in Operational Condition 1. Entry into Operational Condition 2 during a controlled shutdown is typically performed at approximately 10% reactor power. This power level is above that which will result in an SRM Upscale trip. Therefore, the SRMs are not inserted into the reactor core until reactor power has been reduced to the lower ranges of the IRMs. Additionally, the SRMs are not required to be operable (per Technical Specification 3/4.3.7.6) until the IRMs are on range 2 or below. Therefore, the proposed exception to the provisions of Technical Specification 4.0.4 (and the associated 12 hour time limit) for the SRMs should apply upon reaching "Operational Condition 2 with the IRMs on range 2 or below" versus "Operational Condition 2." This revision is also consistent with the proposed exception to the provisions of Technical Specification 4.0.4 provided in IP's original request for the SRM surveillance requirements of Technical Specification 3/4.3.7.6.

The justification for this revision is bounded by the original justification provided in IP's August 31, 1990 request. Further, the Basis for No Significant Hazards Consideration and the basis for meeting the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement, as provided in the original request, remain unchanged. A marked-up copy of the affected page (page 3/4 3-63) from the August 31, 1990 request is attached. (The requested revisions to the August 31, 1990 request are identified by double change bars.) Additional pages from the August 31, 1990 request are also attached for information only.

Sincerely yours,


J. S. Perry
Vice President

DAS/alh

Attachment

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