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U-602302  
L47-94(06 -16 )LP  
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JGC-119-94  
June 16, 1994  
10CFR50.90

Docket No. 50-461

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

Subject: Clinton Power Station Revision to Previously Submitted Proposed  
Amendment of Facility Operating License No. NPF-62 (LS-91-023)

Dear Sir:

By letter dated April 18, 1994 (reference U-602243), Illinois Power (IP) requested amendment of Facility Operating License No. NPF-62, Appendix A-Technical Specifications (TS) for Clinton Power Station (CPS), to allow IP to adopt a later revision to the American Society for Testing and Materials (ASTM) test method utilized for periodic laboratory testing of the charcoal used in engineered safety feature filter systems. IP's request was prompted by a recommendation from an NRC inspector. The approach taken at that time was to propose deletion of the year/revision of the ASTM Standard currently specified in the TS to allow the flexibility to adopt future revisions to this standard without the need to process a future TS change. This approach is consistent with the requirements currently contained in the TS for at least one other nuclear power plant. The systems affected by this proposed change are the standby gas treatment system (SGTS) (TS 3/4.6.6.3) and the main control room filter system (VC) (TS 3/4.7.2).

During the review of IP's request, a number of concerns were expressed by the NRC staff. These included the fact that, although IP intended to adopt the revision of the ASTM D3803 standard that the NRC considers to be the best testing requirements currently available (the 1989 revision), the NRC staff does not intend to allow the use of later revisions which have not been reviewed and approved by the NRC staff. In addition, based on the NRC staff's experience with the results of laboratory testing of nuclear grade charcoal, the NRC staff does not believe that testing at temperatures above 30°C is sufficiently conservative for predicting charcoal performance during accident conditions. The test conditions currently specified for the SGTS in the CPS TS include a temperature of 80°C.

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In response to the NRC staff's expressed concerns, IP has determined that two changes to IP's April 18, 1994 amendment request should be made. These consist of (1) adding "-89" after "ASTM D3803" in the testing requirements specified for both the SGTS and VC charcoal, and (2) changing the test temperature specified for testing of the SGTS charcoal from 80°C to 30°C. (The test temperature for the VC system charcoal is currently specified as 30°C and would not be affected.) These changes are identified by double change bars on the attached pages from the CPS TS contained in Attachment 2 to this letter. The pages contained in Attachment 2 to this letter replace those previously submitted in Attachment 3 to U-602243. In addition, Attachment 3 to this letter contains a proposed correction to the Bases for TS 3.7.2. This correction is identical to that previously provided in Attachment 4 to U-602243 and is being resubmitted for completeness. The proposed changes to IP's Improved Technical Specifications (ITS) conversion submittal contained in Attachment 5 to U-602243 also require revision. However, corrections to the ITS conversion submittal will be provided as part of the "Proof and Review" comment resolution submittal to the NRC currently scheduled for July 1994. An affidavit supporting the facts set forth in this letter and its attachments is provided in Attachment 1.

IP has reviewed the changes requested by this letter and concluded that the basis for no significant hazards consideration and basis for meeting the 10CFR51.22(c)(9) criteria for a categorical exclusion from an Environmental Impact Statement provided in IP's April 18, 1994 letter remain valid for this request.

Sincerely yours,



J. G. Cook  
Vice President

DAS/csm

Attachments

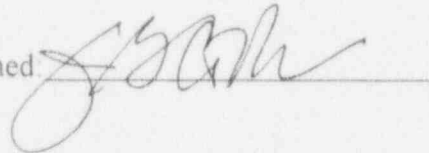
cc: NRC Clinton Licensing Project Manager  
NRC Resident Office, V-690  
Regional Administrator, Region III, USNRC  
Illinois Department of Nuclear Safety

STATE OF ILLINOIS  
COUNTY OF DEWITT

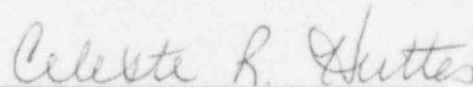
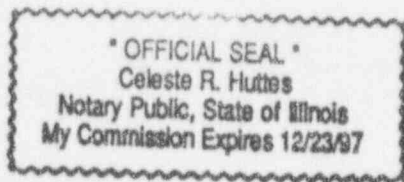
John G. Cook, being first duly sworn, deposes and says: That he is Vice President of Illinois Power Company; that the application for amendment of Facility Operating License NPF-62 has been prepared under his supervision and direction; that he knows the contents thereof, and that to the best of his knowledge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

DATED: This 16 day of June 1994

Signed



Subscribed and sworn to before me this 16 day of June 1994.



Notary Public