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U-602355
L47-94(10-14)LP
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JGC-300-94
October 14, 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-94-006] (Reference: Illinois
Power Letter U-602320, dated August 12, 1994)

Dear Sir:

By letter dated August 12, 1994 Illinois Power (IP) submitted an application for amendment of the Clinton Power Station (CPS) Operating License (License No. NPF-62) to incorporate a proposed change to the CPS Technical Specifications (Appendix A). Specifically, IP proposed to revise Technical Specification 3/4.6.2.2, "Drywell Bypass Leakage," to allow drywell bypass leakage tests (DBLRTs) to be performed at intervals of up to ten years based on the demonstrated performance of the drywell barrier with respect to leak tightness. In the event of a DBLRT failure, the frequency would be required to be increased to at least once per 36 months. If the subsequent DBLRT meets the leakage limit, the ten-year schedule would be permitted to be resumed. In the event of two consecutive DBLRT failures, the frequency would be required to be increased to at least once per 18 months until two consecutive DBLRTs meet the limit, at which time the ten-year schedule would be permitted to be resumed.

Recent discussions with the NRC Licensing Project Manager for CPS indicate that the NRC staff has completed its technical review of IP's application. The NRC staff has determined that IP's request is acceptable except for the proposed length (ten years) of the increased test interval. The Staff's position (Containment Systems and Severe Accident Branch) is that a five-year interval is more appropriate. Although the DBLRT is not subject to the requirements and provisions of 10CFR50 Appendix J, the Staff has indicated that a five-year DBLRT test interval is consistent with the five-year test interval currently being considered for Type C local leak rate testing (of containment isolation valves) pursuant to the currently proposed revision of 10CFR50 Appendix J.

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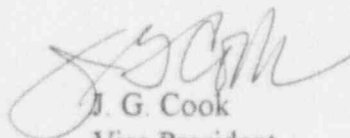
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IP's position that a ten-year test interval is appropriate for CPS, based on the reasons provided in its August 12 application, remains unchanged. However, in the interest of obtaining NRC approval of a license amendment that supports an extension of the current test interval in sufficient time to support the upcoming refueling outage, IP accepts the NRC staff's recommendation of a five-year DBLRT test interval and is thus proposing to revise the August 12, 1994 application. Further action to again propose extending the DBLRT to a ten-year interval may be considered at a future time.

To revise the August 12, 1994 application, IP proposes that wherever the proposed Technical Specification and associated Bases changes (as indicated in the August 12 submittal) refer to "10 years," "10-year schedule," "10 year Frequency," or "120 months," these references be changed correspondingly to "5 years," "5-year schedule," "5 year Frequency," and "60 months." A revised marked-up copy of the affected page from the current CPS Technical Specifications is provided in Attachment 2 to this letter. (This marked-up page replaces the marked-up page originally provided in Attachment 3 to U-602320.) A revised marked-up copy of the affected pages from IP's request to convert to the Improved Standard Technical Specifications (reference: IP Letter U-602196 dated October 26, 1993) is provided in Attachment 3. (The pages provided in Attachment 3 are based on the marked-up pages provided in Attachment 4 to U-602320. As the marked-up pages have been revised, Attachment 3 supersedes Attachment 4 to U-602320. Further, because these pages already contain mark-ups, the above-described changes (to reflect a five-year DBLRT test interval) are specifically indicated by use of double revision bars.) In addition, an affidavit supporting the facts set forth in this letter and its attachments is provided in Attachment 1.

With further respect to the changes described in this letter and their impact on IP's originally proposed change, it should be noted that the Basis for No Significant Hazards Consideration as evaluated by IP in its August 12 submittal remains unchanged. In addition, IP's evaluation of the proposed change against the criteria of 10CFR51.22 also remains unchanged such that the proposed change still meets the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.

Sincerely yours,


J. G. Cook
Vice President

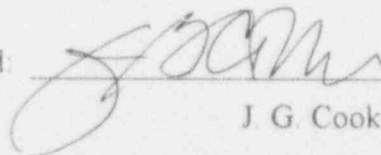
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cc: NRC Clinton Licensing Project Manager
NRC Resident Office, V-690
Regional Administrator, Region III, USNRC
Illinois Department of Nuclear Safety

J. G. Cook, being first duly sworn, deposes and says: That he is Vice President of Illinois Power; that this 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 letter and the facts contained therein are true and correct.

Date: This 14th day of October 1994.

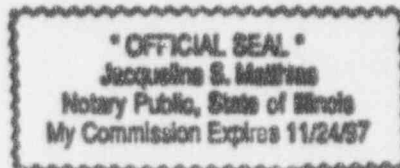
Signed: _____


J. G. Cook

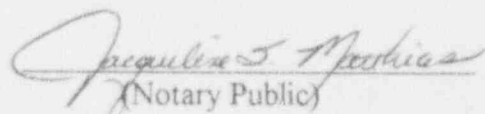
STATE OF ILLINOIS

} SS.

Dewitt COUNTY



Subscribed and sworn to before me this 14th day of October 1994.


(Notary Public)