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JSP-078-92
February 7, 1992
10CFR50.90

Docket No. 50-461

Document Control Desk
Nuclear Regulatory Commission
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 (IP) hereby applies for amendment of Facility Operating License No. NPF-62, Appendix A - Technical Specifications, for Clinton Power Station (CPS). This request consists of proposed changes to delete numerous component lists as recommended in NRC Generic Letter 91-08. In addition, this request consists of proposed changes to delete the reactor vessel specimen withdrawal schedule as recommended by NRC Generic Letter 91-01.

For each of these proposed changes, a description and the associated justification (including a Basis For No Significant Hazards Consideration) are provided in Attachment 2. Marked-up copies of pages from the current Technical Specifications reflecting the combined effect of these proposed changes are provided in Attachment 3. In addition, an affidavit supporting the facts set forth in this letter and its attachments is provided in Attachment 1.

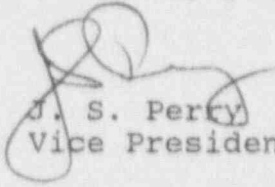
IP has reviewed the proposed changes against the criteria of 10CFR51.22 for categorical exclusion from environmental impact considerations. The proposed changes do not involve a significant hazards consideration, or significantly increase the amounts or change the types of effluents that may be released offsite, nor do they significantly increase

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individual or cumulative occupational radiation exposures. Based on the foregoing, IP concludes that the proposed changes meet the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.

Sincerely yours,



J. S. Percy
Vice President

DAS/alh

Attachments

cc: NRC Clinton Licensing Project Manager
NRC Resident Office
Regional Administrator, Region III, USNRC
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.

DATE: This 7 day of February 1992

Signed: _____

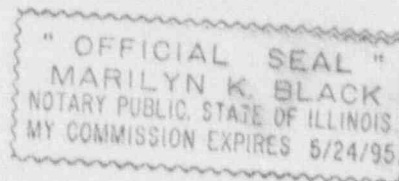
J. Stephen Perry
J. Stephen Perry

Subscribed and sworn to before me this 7 day of
February 1992.

State of IL, County of De Witt
Signed before me on this 7th day
of February 1992 by J. Stephen Perry

Notary Public

Marilyn K. Black
Notary Public



Background

The NRC and plant licensees have noted that many license amendments have been required in order to modify lists of components contained in the Technical Specifications (TS). The NRC has concluded that these lists are unnecessary if the TS Limiting Conditions for Operation (LCOs) are modified to describe those components to which the TS applies. On May 6, 1991, the NRC issued Generic Letter (GL) 91-08, "Removal of Component Lists from Technical Specifications," to provide guidance on preparing amendment requests to delete component lists from the TS.

Generic Letter 91-08 states that to remove a component list from the TS, the TS should be revised to incorporate an explicit description of those components for which the TS requirements apply. Additionally, a list of those components must be included in a plant procedure that is subject to the change control provisions for plant procedures in the Administrative Controls section of the TS.

On January 4, 1991, the NRC issued GL 91-01, "Removal of the Schedule for the Withdrawal of Reactor Vessel Material Specimens from Technical Specifications." GL 91-01 is similar to GL 91-08 in that it also recommends removal of an unnecessary list from the TS, but GL 91-01 only applies to the TS schedule for withdrawing reactor vessel material specimens from the reactor. This TS schedule is redundant to the requirements of 10CFR50, Appendix H and therefore does not need to be included in the TS.

This amendment request involves proposed changes to the Clinton Power Station (CPS) TS to incorporate the guidance of Generic Letters 91-01 and 91-08. In addition, this request includes proposed changes of an editorial nature to update the TS Index, delete the Bases for a TS which was previously deleted, and provide additional clarification. The combined effect of these proposed changes is shown on the marked-up copies of CPS TS pages contained in Attachment 3 to this request.

Description of Proposed Changes

In accordance with GL 91-01, GL 91-08, and 10CFR50.90, the following changes to the CPS TS are being proposed. The changes are described in the order in which the associated TS appears in the CPS TS.

- (1) The TS Index (pages ii, iii, iv, viii, x, xi, xii, xiii, xv, xvii, xviii, xx, xxi, xxii, and xxiii) is being revised to make editorial corrections, reflect the deletion of tables which contain component lists (as described below), and reflect renumbering of pages due to deletion of large lists.
- (2) Definition 1.12, DRYWELL INTEGRITY, is being revised to delete reference to TS Table 3.6.4-1, "Containment Isolation Valves," and TS 3.6.4, "Containment Isolation Valves."
- (3) Definition 1.31, PRIMARY CONTAINMENT INTEGRITY, is being revised to delete reference to TS Table 3.6.4-1 and to provide clarification that the containment penetrations, equipment hatches, air locks, and

leakage rates addressed by this definition are those associated with primary containment (vs. secondary containment, for example).

- (4) Definition 1.38, SECONDARY CONTAINMENT INTEGRITY, is being revised to delete reference to TS Table 3.6.6.2-1, "Secondary Containment Ventilation System Automatic Isolation Dampers."
- (5) Footnote "++" to TS Table 3.6.2-1, "CRVICS Instrumentation," is being deleted since it provides a cross-reference to TS Table 3.6.4-1 and this information (as currently provided on TS Table 3.6.4-2, "Containment Isolation Trip Signals") is being added as footnote (q) to TS Table 3.3.2-1. Additionally, footnote (f) is being revised to delete reference to TS Table 3.6.6.2-1 and footnote (j) is being revised to delete references to TS Table 3.6.6.2-1 and footnote "++".
- (6) TS 3.3.7.4, "Remote Shutdown Monitoring Instrumentation," is being revised to delete Table 3.3.7.4-1, "Remote Shutdown Monitoring Instrumentation"; Table 3.3.7.4-2, "Remote Shutdown System Controls"; and Table 4.3.7.4-1, "Remote Shutdown Monitoring Instrumentation Surveillance Requirements". The LCO is being revised to delete references to Tables 3.3.7.4-1 and 3.3.7.4-2. A footnote is being attached to the LCO to incorporate footnote "*" to Table 3.3.7.4-2. Footnote "*" states that this TS excludes those controls associated with the residual heat removal (RHR) system steam condensing mode. Additionally, the Action Statements are being revised to delete references to Tables 3.3.7.4-1 and 3.3.7.4-2, and Surveillance Requirement 4.3.7.4.1 is being revised to delete reference to Table 4.3.7.4-1. Further, the word "required" is being incorporated into the Action Statements and Surveillance Requirement 4.3.7.4.2 to denote that there are controls installed on the remote shutdown panel to which this TS does not apply (i.e., those associated with the RHR steam condensing mode, for example).
- (7) Footnote "++" to TS Table 3.3.7.5-1, "Accident Monitoring Instrumentation," is being revised to replace reference to TS Table 3.6.4-1 with a reference to Specification 3.6.4.
- (8) TS Table 4.4.6.1-1, "Reactor Vessel Material Surveillance Program - Withdrawal Schedule," is being deleted along with the reference to it in Surveillance Requirement 4.4.6.1.4. The Bases associated with this TS are also being revised to delete reference to TS Table 4.4.6.1-1.
- (9) Surveillance Requirement 4.6.1.1.b of TS 3.6.1.1, "Primary Containment Integrity," is being revised to delete reference to TS Table 3.6.4-1 and provide clarification that the containment penetrations addressed by this surveillance are those associated with primary containment (vs. secondary containment, for example).
- (10) TS 3.6.1.2, "Primary Containment Leakage," LCO item d and Action Statement d are being revised to delete references to TS Table 3.6.4-1 for secondary containment bypass leakage paths. Additionally, LCO item e, Action Statement e, Surveillance Requirement 4.6.1.2.d.4, and Surveillance Requirement 4.6.1.2.h are being revised to delete references to TS Table 3.6.4-1 for primary containment isolation

valves in hydrostatically tested lines. The current test pressure for main steam isolation valves (Pa, 9.0 psig) and for hydrostatically tested valves (1.10 Pa, 9.9 psig) is also being included in Surveillance Requirements 4.6.1.2.f and 4.6.1.2.h, respectively, since these pressures are currently specified on TS Table 3.6.4-1. Footnote "*" to Surveillance Requirement 4.6.1.2.d is being deleted because it is unnecessary as Surveillance Requirement 4.6.1.2.h specifies the test pressure and frequency for performing leak testing of hydrostatically tested valves. Further, footnote "***" associated with Surveillance Requirement 4.6.1.2.d is being deleted since this footnote was only applicable until the first refueling outage and Surveillance Requirement 4.6.1.2.g is being editorially revised to make the wording consistent with 10CFR50, Appendix J, paragraph III.D.2(a).

- (11) Surveillance Requirement 4.6.1.7 associated with TS 3.6.1.7, "Primary Containment Average Air Temperature," is being revised to delete the method and list of instrument locations used to verify that the primary containment average air temperature is within limits. The Bases for this TS are being revised to incorporate the method described in the surveillance and associated footnote "*".
- (12) Surveillance Requirement 4.6.2.6 associated with TS 3.6.2.6, "Drywell Average Air Temperature," is being revised to delete the method and list of instruments used to verify that the drywell average air temperature is within limits. The Bases for this TS are being revised to incorporate the method described in the surveillance and associated footnote "*".
- (13) The following changes to TS 3.6.4, "Containment Isolation Valves," are being proposed:
 - (i) The title is being revised to "Primary Containment Isolation Valves" to clarify that this TS only applies to primary containment isolation valves (PCIVs) (vs. secondary containment isolation valves, for example).
 - (ii) Table 3.6.4-1, "Containment Isolation Valves," and Table 3.6.4-2, "Containment Isolation Trip Signals," are being deleted.
 - (iii) The LCO is being revised to delete references to the valves and isolation times specified on Table 3.6.4-1.
 - (iv) Footnote "#" associated with the LCO is being revised to delete reference to Table 3.6.4-1 and add a statement which allows locked-closed or sealed-closed valves to be opened on an intermittent basis under administrative control.
 - (v) The Applicability Statement is being revised to delete reference to Table 3.6.4-1 and add that all PCIVs are required to be OPERABLE in OPERATIONAL CONDITIONS 1, 2, and 3; those PCIVs which isolate secondary containment bypass leakage paths are required to be OPERABLE in OPERATIONAL CONDITIONS 1, 2, 3, and ** (when handling irradiated fuel in the secondary containment and during CORE ALTERATIONS and operations with a potential for draining the reactor vessel); and those PCIVs which isolate the reactor water cleanup system suction containment penetration are required to be OPERABLE in OPERATIONAL CONDITIONS 1, 2, 3, and 5***. (Footnote *** is

valves in hydrostatically tested lines. The current test pressure for main steam isolation valves (Pa, 9.0 psig) and for hydrostatically tested valves (1.10 Pa, 9.9 psig) is also being included in Surveillance Requirements 4.6.1.2.f and 4.6.1.2.h, respectively, since these pressures are currently specified on TS Table 3.6.4-1. Footnote "*" to Surveillance Requirement 4.6.1.2.d is being deleted because it is unnecessary as Surveillance Requirement 4.6.1.2.h specifies the test pressure and frequency for performing leak testing of hydrostatically tested valves. Further, footnote "***" associated with Surveillance Requirement 4.6.1.2.d is being deleted since this footnote was only applicable until the first refueling outage and Surveillance Requirement 4.6.1.2.g is being editorially revised to make the wording consistent with 10CFR50, Appendix J, paragraph III.D.2(a).

- (11) Surveillance Requirement 4.6.1.7 associated with TS 3.6.1.7, "Primary Containment Average Air Temperature," is being revised to delete the method and list of instrument locations used to verify that the primary containment average air temperature is within limits. The Bases for this TS are being revised to incorporate the method described in the surveillance and associated footnote "*".
- (12) Surveillance Requirement 4.6.2.6 associated with TS 3.6.2.6, "Drywell Average Air Temperature," is being revised to delete the method and list of instruments used to verify that the drywell average air temperature is within limits. The Bases for this TS are being revised to incorporate the method described in the surveillance and associated footnote "*".
- (13) The following changes to TS 3.6.4, "Containment Isolation Valves," are being proposed:
 - (i) The title is being revised to "Primary Containment Isolation Valves" to clarify that this TS only applies to primary containment isolation valves (PCIVs) (vs. secondary containment isolation valves, for example).
 - (ii) Table 3.6.4-1, "Containment Isolation Valves," and Table 3.6.4-2, "Containment Isolation Trip Signals," are being deleted.
 - (iii) The LCO is being revised to delete references to the valves and isolation times specified on Table 3.6.4-1.
 - (iv) Footnote "#" associated with the LCO is being revised to delete reference to Table 3.6.4-1 and add a statement which allows locked-closed or sealed-closed valves to be opened on an intermittent basis under administrative control.
 - (v) The Applicability Statement is being revised to delete reference to Table 3.6.4-1 and add that all PCIVs are required to be OPERABLE in OPERATIONAL CONDITIONS 1, 2, and 3; those PCIVs which isolate secondary containment bypass leakage paths are required to be OPERABLE in OPERATIONAL CONDITIONS 1, 2, 3, and ** (when handling irradiated fuel in the secondary containment and during CORE ALTERATIONS and operations with a potential for draining the reactor vessel); and those PCIVs which isolate the reactor water cleanup system suction containment penetration are required to be OPERABLE in OPERATIONAL CONDITIONS 1, 2, 3, and 5***. (Footnote *** is

being moved from Table 3.6.4-1 and states "with any control rod withdrawn. Not applicable to control rods removed per Specification 3.9.10.1 or 3.9.10.2".) These changes are being made to reflect the Applicable Operational Conditions as currently specified on Table 3.6.4-1.

- (vi) Action "a" is being revised to delete reference to Table 3.6.4-1 and add the word "primary" for clarification as described in item (i) above. Additionally, an editorial correction is being made to footnote "+" associated with this Action Statement.
 - (vii) Action "b" is being revised to delete reference to Table 3.6.4-1 and add "primary containment isolation" to clarify that this Action Statement applies only to those instrumentation line excess flow check valves which are PCIVs. Additionally, a statement that the provisions of Specification 3.0.4 are not applicable is being added to this Action Statement. This addition is as recommended in GL 91-08.
 - (viii) The Surveillance Requirements (4.6.4.1, 4.6.4.2, 4.6.4.3, and 4.6.4.4) are being revised to delete references to Table 3.6.4-1 and add "primary containment isolation" to clarify that these surveillances are only applicable to PCIVs (vs. secondary containment isolation valves, for example).
 - (ix) Surveillance Requirement 4.6.4.1 is being revised to delete the word "specified" since, with the deletion of Table 3.6.4-1, the isolation times for automatic PCIVs are no longer specified.
 - (x) Surveillance Requirement 4.6.4.4 is being revised to delete the word "provided" and add the word "required" since, with the deletion of Table 3.6.4-1, the differential pressure for actuation of instrument line excess flow check PCIVs is no longer provided.
 - (xi) The Bases for TS 3/4.6.4 are being revised to add a discussion on the basis for the requirement that PCIVs which isolate the reactor water cleanup system suction containment penetrations be OPERABLE in OPERATIONAL CONDITION 5 with any control rod withdrawn. Additionally, those considerations that constitute acceptable administrative control for opening locked-closed or sealed-closed PCIVs are being added to the Bases for TS 3/4.6.4 as requested by GL 91-08.
- (14) Pages 3/4 6-63 through 3/4 6-76 are being renumbered as 3/4 6-31 through 3/4 6-44 due to the deletion of Tables 3.6.4-1, 3.6.4-2 and 3.6.6.2-1.
- (15) Surveillance Requirement 4.6.6.1.b.3 associated with TS 3.6.6.1, "Secondary Containment Integrity," is being revised to include a reference to address compliance with TS 3.6.6.2. This reference is currently contained in the definition for SECONDARY CONTAINMENT INTEGRITY and is similar to the reference provided in Surveillance Requirement 4.6.1.1.b. The proposed provision allows compliance with the Actions of the associated isolation damper TS without additionally requiring entry into the Action Statement for SECONDARY CONTAINMENT INTEGRITY (due to the Surveillance Requirement no longer being met).
- (16) TS Table 3.6.6.2-1, "Secondary Containment Ventilation System Automatic Isolation Dampers," is being deleted. The LCO is being

revised to delete references to the dampers and isolation times specified on Table 3.6.6.2-1. The references to Table 3.6.6.2-1 are also being deleted from the associated Action Statement and Surveillance Requirement 4.6.6.2. Additionally, Surveillance Requirement 4.6.6.2.a is being revised to delete the word "specified" since, with the deletion of Table 3.6.6.2-1, the isolation times are no longer specified. Further, Surveillance Requirement 4.6.6.2.b is being revised to clarify that the containment isolation test signal identified in this surveillance is a secondary containment isolation signal (vs. primary containment isolation signal, for example) and that the isolation dampers to be verified are secondary containment automatic isolation dampers (vs. main control room isolation dampers, for example).

- (17) TS Table 3.8.4.1-1, "Containment Penetration Conductor Overcurrent Protective Devices," is being deleted. The LCO is being revised to delete reference to Table 3.8.4.1-1 and to state that the scope of this TS includes the primary and backup containment penetration conductor overcurrent protective devices associated with each primary containment electrical penetration circuit but excludes those circuits for which credible fault currents would not exceed the electrical penetrations' design ratings. This revision to the LCO is as recommended in GL 91-08. Additionally, Action "a" and Surveillance Requirement 4.8.4.1 are being revised to delete references to Table 3.8.4.1-1 and to add the word "required" to denote that there may be containment penetration conductor overcurrent protective devices installed in the plant which are not within the scope of this TS. Further, the Bases for this TS are being revised to note that the low-frequency motor generator set electrical supply to each reactor recirculation pump is provided with one overcurrent protection circuit breaker since the generator's maximum output under fault conditions is less than the penetration's design rating. These circuit breakers are currently within the scope of this TS.
- (18) TS pages 3/4 8-45 and 3/4 8-53 are being renumbered as 3/4 8-26 and 3/4 8-27, respectively, due to the deletion of TS Tables 3.8.4.1-1 and 3.8.4.2-1.
- (19) TS Table 3.8.4.2-1 "Motor Operated Valves Thermal Overload Protection," is being deleted. The LCO is being revised to delete reference to Table 3.8.4.2-1 and to clarify that this TS applies only to valves in safety systems with bypass devices integral with the motor starter (i.e., those valves within the scope of Regulatory Guide 1.106, "Thermal Overload Protection for Electric Motors on Motor-Operated Valves," Revision 1, March 1977). The LCO is also being revised to clarify that the thermal overload protection is only required to be bypassed in those directions for which the valve performs an active safety function. Additionally, the Action Statement and Surveillance Requirements are being simplified and revised to agree with the revised LCO.
- (20) The Bases associated with TS 3/4.3.8, "Turbine Overspeed Protection System," are being deleted to reflect the deletion of this TS by Amendment No. 60 to NPF-62 dated October 9, 1991.

Justification for Proposed Changes

The proposed changes previously identified as items (1), (14), (18), and (20) are purely editorial changes to the TS Index and page numbering to reflect the deletion of tables and to correct editorial errors. The proposed changes previously identified as items (5) and (7) are purely editorial in that they merely reflect the deletion of references to tables which are being deleted as discussed below. These references are informational only and do not contain any requirements. The remaining proposed changes are discussed in more detail below.

Proposed change (2) consists of proposed changes to Definition 1.12, DRYWELL INTEGRITY, to delete inappropriate references to Table 3.6.4-1 and TS 3.6.4. Table 3.6.4-1 is being deleted (as discussed below) and TS 3.6.4 addresses the requirements for primary containment isolation valves (PCIVs). Since TS 3.6.4 was not intended to address the requirements for OPERABILITY of drywell isolation valves, it is not appropriate for this definition to reference TS 3.6.4. As a result, this proposed change does not result in a change to any technical requirements.

Proposed change (3) addresses changes to Definition 1.31, PRIMARY CONTAINMENT INTEGRITY. Items a, b, c, and d are being modified by inserting the word "primary" to clarify that the containment penetrations, equipment hatches, air locks, and leakage rates, respectively addressed by this definition are those associated with the primary containment (vs. secondary containment, for example). These changes are provided for clarification only and do not result in any technical change.

The remaining change contained in proposed change (3) consists of deletion of the reference to TS Table 3.6.4-1. GL 91-08 addresses changes to the definition of CONTAINMENT INTEGRITY. However, the GL example only addresses inoperability of locked-closed or sealed-closed valves due to being open under administrative control. This definition should likewise be satisfied while operating in compliance with the Actions of TS 3.6.4, regardless of the PCIV involved or the cause of inoperability. The proposed change ensures that operation under the provisions of the Actions of TS 3.6.4 (which allow four hours to isolate the penetration associated with an inoperable PCIV) does not result in an unnecessary plant shutdown per TS 3.6.1.1 (which has a one-hour Action Statement) because the definition of PRIMARY CONTAINMENT INTEGRITY is not satisfied. This definition is currently satisfied while operating under the provisions of the Actions of TS 3.6.4. As a result, this proposed change does not result in a technical change to the current requirements.

Proposed change (4) addresses changes to Definition 1.38, SECONDARY CONTAINMENT INTEGRITY. Item a.2 of this definition is being revised to delete reference to Table 3.6.6.2-1 similar to the proposed deletion of reference to Table 3.6.4-1 described above under proposed change (3). This proposed change will allow the definition of SECONDARY CONTAINMENT INTEGRITY to continue to be met (and hence, maintain compliance with the LCO of TS 3.6.6.1) when the Actions of TS 3.6.6.2 are being met.

Proposed change (6) addresses the proposed deletion of TS Table 3.3.7.4-1, "Remote Shutdown Monitoring Instrumentation," Table 3.3.7.4-2, "Remote Shutdown System Controls," and Table 4.3.7.4-1, "Remote Shutdown Monitoring

Instrumentation Surveillance Requirements." The LCO is being revised to delete references to Tables 3.3.7.4-1 and 3.3.7.4-2. In addition, a footnote is being attached to the LCO to state that the scope of this TS does not include those controls associated with the RHR steam condensing mode. This footnote is provided to incorporate footnote "*" to Table 3.3.7.4-2 into the LCO. The proposed changes to the Action Statements merely reflect the deletion of Tables 3.3.7.4-1 and 3.3.7.4-2 and provide clarification that there are controls installed on the remote shutdown panel which are not required by this TS (i.e., those associated with the RHR steam condensing mode, for example). The requirements contained on Table 4.3.7.4-1 have been incorporated into Surveillance Requirement 4.3.7.4.1. The proposed change to Surveillance Requirement 4.3.7.4.2 is provided for clarification only similar to the changes proposed for the Action Statements. None of the above changes results in any technical change to the scope or intent of the existing requirements.

The instruments listed on Table 3.3.7.4-1 are contained in CPS Procedure No. 9000.10, "Accident Monitoring and Remote Shutdown Instrumentation Log." The controls currently listed on Table 3.3.7.4-2 are partially listed in CPS Procedure No. 9027.01, "Remote Shutdown Panel Operability Check," and partially in CPS Procedure No. 9054.05, "RCIC Pump Flow Operability (Low Steam Pressure)." The combination of these latter two procedures provides the total list of controls currently listed on Table 3.3.7.4-2. The above procedures address surveillances of the above equipment and are therefore subject to the change control program of Section 6.8 of the CPS TS. As a result, the proposed changes to TS 3/4.3.7.4 are in accordance with GL 91-08. In addition, the remote shutdown instrumentation and controls are described in Section 7.4.1.4 of the CPS Updated Safety Analysis Report (USAR).

Proposed change (8) consists of deletion of Table 4.4.6.1-1, "Reactor Vessel Material Surveillance Program-Withdrawal Schedule," and deletion of the reference to this table in Surveillance Requirement 4.4.6.1.4 and the Bases for this TS. As stated in GL 91-01, this schedule is redundant to 10CFR50, Appendix H (which requires prior NRC approval of changes to the withdrawal schedule). Therefore, it is unnecessary to retain this table in the TS. The capsule numbers, vessel locations and withdrawal schedule are contained in CPS Procedure No. 9846.01, "Reactor Vessel Irradiation Surveillance Specimen Removal and Examination." This procedure is subject to the change control program of Section 6.8 of the CPS TS. In addition, the capsule numbers, vessel locations, lead factors, and withdrawal schedule are described in Section 5.3.1.6 of the CPS USAR. As a result, the proposed changes to TS 3/4.4.6.1 are in accordance with GL 91-01 and 91-08.

Proposed change (9) consists of proposed changes to Surveillance Requirement 4.6.1.1.b associated with TS 3.6.1.1, "Primary Containment Integrity," to delete reference to Table 3.6.4-1 and clarify that the containment penetrations addressed by this surveillance are those associated with the primary containment (vs. secondary containment, for example). As addressed under proposed change (3) above, the proposed method of deletion of the reference to Table 3.6.4-1 is different than the example provided in GL 91-08. However, this proposed change continues to allow operation in conformance with the Actions of TS 3.6.4 without also resulting in entry into the Actions of TS 3.6.1.1 (due to this Surveillance

Requirement no longer being met). As a result, these proposed changes do not result in a technical change to the current requirements.

Proposed change (10) addresses the proposed changes to TS 3/4.6.1.2, "Primary Containment Leakage." These changes consist of deletion of the reference to Table 3.6.4-1 for the list of containment penetrations which constitute secondary containment bypass leakage paths and the list of those PCIVs which are in hydrostatically tested lines. Additionally, editorial changes are proposed to delete redundant footnote "*" associated with Surveillance Requirement 4.6.1.2.d; correct the wording of Surveillance Requirement 4.6.1.2.g to be consistent with 10CFR50, Appendix J, paragraph III.D.2(a); and delete footnote "***" associated with Surveillance Requirement 4.6.1.2.d since this footnote was only applicable until the first refueling outage. Further, the current test pressure for main steam isolation valves (Pa, 9.0 psig) and hydrostatically tested lines (1.10 Pa, 9.9 psig) is being included in Surveillance Requirements 4.6.1.2.f and 4.6.1.2.h, respectively.

As stated in GL 91-08, those penetrations which constitute secondary containment bypass leakage paths are defined in the USAR (Table 6.2-47). In addition, CPS Procedure No. 9861.02F004, "Bypass Leakage Summary Sheet," identifies those penetrations which constitute secondary containment bypass leakage paths whose individual leakages are summed to verify that the total secondary containment bypass leakage is within its limit. Similarly, those PCIVs in hydrostatically tested lines are identified on USAR Table 6.2-47 and the data sheets of CPS Procedure No. 9861.05, "Water Local Leak Rate Testing". As a result, the list of secondary containment bypass leakage paths and the list of PCIVs in lines which are hydrostatically tested are addressed in surveillance procedures which are subject to the change control program of Section 6.8 of the CPS TS. Therefore, these proposed changes do not result in any technical changes to the requirements of TS 3/4.6.1.2 and are in accordance with GL 91-08.

Proposed change (11) addresses the deletion of the method and list of instrument locations used to determine the primary containment average air temperature per TS 3/4.6.1.7, "Primary Containment Average Air Temperature." CPS Procedure No. 9000.01D001, "Control Room Operator Surveillance Log - Mode 1,2,3 Data Sheet," contains a list of the instruments and the method used to determine the primary containment average air temperature. Additionally, the Bases for this TS are being updated to describe the method and controls on the number of operable instruments used to determine the average temperature. These proposed changes do not result in any technical change to the TS LCO requirement that the primary containment average air temperature be $\leq 122^{\circ}\text{F}$ or to the method used to determine compliance with the LCO. The instruments and method used to determine the primary containment average air temperature are addressed in a surveillance procedure which is subject to the change control program of Section 6.8 of the CPS TS. Therefore, these proposed changes are in conformance with GL 91-08.

Proposed change (12) addresses the deletion of the method and list of instruments used to determine the drywell average air temperature per TS 3/4.6.2.6, "Drywell Average Air Temperature." CPS Procedure No. 9000.01D001, "Control Room Operator Surveillance Log - Mode 1,2,3 Data Sheet," contains a list of the instruments and method used to determine the

drywell average air temperature. Additionally, the Bases for this TS are being updated to describe the method and controls on the number of operable instruments used to determine the average temperature. These proposed changes do not result in any technical change to the TS LCO requirement that the drywell average air temperature be $\leq 135^{\circ}\text{F}$ or to the method used to determine compliance with the LCO. The instruments and method used to determine the drywell average air temperature are addressed in a surveillance procedure which is subject to the change control program of Section 6.8 of the CPS TS. Therefore, these proposed changes are in conformance with GL 91-08.

Proposed change (13) addresses the deletion of Table 3.6.4-1, "Containment Isolation Valves," and Table 3.6.4-2, "Containment Isolation Trip Signals." The deletion of Table 3.6.4-2 (and the isolation signals listed on Table 3.6.4-1) is an editorial change since this table is informational only in that it provides a cross-reference to the isolation signals of TS 3.3.2, "Containment and Reactor Vessel Isolation Control System." Since TS Table 3.3.2.1 continues to utilize these isolation signal symbols, the information currently contained on TS Table 3.6.4-2 has been incorporated as footnote (q) to Table 3.3.2-1. The associated isolation actuation instrumentation continues to be required OPERABLE per TS 3.3.2.

The proposed changes to the LCO to delete references to the valves and isolation times listed on Table 3.6.4-1 are in accordance with GL 91-08. The CPS USAR (Table 6.2-47) lists the PCIVs associated with each containment penetration and the isolation times of each automatic PCIV. In addition, PCIVs are listed in Appendix F of CPS Procedure No. 9861.02, "Local Leak Rate Testing Requirements and Type C (Air) Local Leak Rate Testing," and the data sheets of the following procedures: CPS Procedure No. 9861.04, "MSIV Local Leak Rate Testing (LMC-5, 6, 7 and 8)"; CPS Procedure No. 9861.05, "Water Local Leak Rate Testing"; and CPS Procedure No. 9864.01, "Excess Flow Check Valve Operability Test." The combination of these procedures provides the total list of PCIVs contained on TS Table 3.6.4-1.

The isolation times for automatic PCIVs are listed in the data sheets of the following procedures: CPS Procedure No. 9051.02, "High Pressure Core Spray (HPCS) Valve Operability Test"; CPS Procedure No. 9052.02, "Low Pressure Core Spray (LPCS) Valve Operability Checks"; CPS Procedure No. 9053.04, "Residual Heat Removal (RHR) A/B/C Valve Operability Checks"; CPS Procedure No. 9053.05, "RHR/LPCS Valve Oper (Shutdown)"; CPS Procedure No. 9054.02, "Reactor Core Isolation Cooling Valve Operability Checks"; CPS Procedure No. 9061.03, "Containment/Drywell Isolation Valve Three-Month Operability"; CPS Procedure No. 9061.06, "Containment/Drywell Isolation Valve Cold Shutdown 18 Month Operability"; CPS Procedure No. 9061.07, "Reactor Water Cleanup Valve Operability"; CPS Procedure No. 9061.08, "Main Steam System Drain Valves Operability"; CPS Procedure No. 9061.09, "MS/FW Sys Valve Oper (Cold S/D)"; and CPS Procedure No. 9061.10, "Fuel Pool Cooling and Cleanup Pump and Valve Operability." The combination of these procedures provides the total isolation time requirements, as provided on TS Table 3.6.4-1, for each automatic containment isolation valve. The required differential pressure for actuation of the instrument line excess flow check PCIVs are listed in the data sheets of CPS Procedure No. 9864.01, "Excess Flow Check Valve Operability Test". As these procedures are subject to the change controls of Section 6.8 of the CPS TS, these

proposed changes are in conformance with GL 91-08 and therefore are acceptable.

Footnote "#" of the LCO is being revised to replace the reference to footnote (h) of Table 3.6.4-1 [since this footnote was only applicable until completion of the associated modification (which has been completed)] with the footnote pertaining to opening of locked-closed or sealed-closed valves under administrative control contained in GL 91-08. This latter change is really just a transfer of the current footnote (a) to Table 3.6.4-1 to the LCO. As a result, there is no technical difference in adding the proposed footnote "#" to the LCO. Additionally, the Bases are being revised to include the considerations for opening locked-closed or sealed-closed valves under administrative control as recommended in GL 91-08.

With respect to deletion of Table 3.6.4-1, the PCIVs associated with each primary containment penetration, as well as the isolation times of automatic PCIVs, are included in USAR Table 6.2-47 and plant procedures as described above. As previously discussed, the isolation signals identified on Tables 3.6.4-1 and 3.6.4-2 are informational only, and therefore, their deletion does not result in any technical changes or changes to operability or testing requirements. As discussed previously per proposed change (10), the primary containment penetrations which constitute secondary containment bypass leakage paths are identified on USAR Table 6.2-47 and in CPS surveillance procedures. As a result, deletion of this section of Table 3.6.4-1 does not result in any technical changes to the operability or testing requirements for these penetrations. The test pressure identified on Table 3.6.4-1 is informational only since TS Surveillance Requirement 4.6.1.2.d requires leak tests to be performed at 2.0 psig for all PCIVs except those in hydrostatically tested lines. For the latter, a test pressure of 9.9 psig is specified under Surveillance Requirement 4.6.1.2.h per proposed change (10). As also previously described under proposed change (10), the PCIVs in hydrostatically tested lines are identified on USAR Table 6.2-47 and in CPS surveillance procedures. As a result, this proposed change does not result in any changes to or deletion of operability, technical or testing requirements. In addition, the requirements contained in the Applicable Operational Condition column of Table 3.6.4-1 are being incorporated into the Applicability Statement of TS 3.6.4 as described below.

With respect to deletion of the footnotes to Table 3.6.4-1, footnote (a) is being incorporated into the LCO as footnote "#" as described above; footnote (h) is being deleted since it is no longer required; and footnotes "b" and "c" are being incorporated into the Applicability Statement of the LCO as described below. The remaining footnotes are informational and their deletion does not result in any technical changes or changes to TS requirements.

With respect to the proposed changes to the Applicability Statement of TS 3.6.4, this statement is being revised to delete reference to Table 3.6.4-1 and incorporate the requirements of the Applicable Operational Conditions column and applicable footnotes of Table 3.6.4-1. With two exceptions, the Applicable Operational Conditions currently specified for each PCIV on Table 3.6.4-1 are identical to those specified by the proposed Applicability Statement(s). Therefore, the proposed changes to the

Applicability Statement of TS 3.6.4 do not result in any technical changes to the plant conditions for which each PCIV is required to be OPERABLE, except as follows:

- (1) The Applicable Operational Conditions for the PCIVs which isolate the reactor water cleanup system suction containment penetration are being expanded to include OPERATIONAL CONDITION 3 per the proposed Applicability Statement to be consistent with the plant conditions for which PRIMARY CONTAINMENT INTEGRITY is currently required by TS 3/4.6.1.1. (These valves are currently only required to be OPERABLE in OPERATIONAL CONDITIONS 1, 2 and 5 with any control rod withdrawn.) Additionally, the basis for the requirement for OPERABILITY of these valves while in OPERATIONAL CONDITION 5 with any control rod withdrawn is being added to the Bases for this TS.
- (2) The requirement to maintain containment heating, ventilation, and air conditioning (HVAC) supply and exhaust isolation valves 1VR002A, B and 1VQ006A, B "sealed closed" in Operational Condition 4 as currently required by TS Table 3.6.4-1 is being deleted. This requirement was originally based on NUREG-0737, "Clarification of TMI Action Plan Requirements," Item II.E.4.2. This requirement states that containment purge valves which do not satisfy the operability criteria set forth in Branch Technical Position (BTP) CSB 6-4 or the Staff Interim Position of October 23, 1979 must be sealed closed during Operational Conditions 1, 2, 3, and 4. Because the subject valves do not receive an automatic isolation signal in response to a loss-of-coolant-accident or high radiation condition, Three Mile Island (TMI) Action Plan Item II.E.4.2 requires these valves to be sealed closed. However, BTP CSB 6-4 and the Staff Interim Position of October 23, 1979 both address these operability requirements in terms of "whenever the containment integrity is required", "whenever the reactor is not in the cold shutdown or refueling mode", and "operational modes of power operation, startup, hot standby and hot shutdown". For a Pressurized Water Reactor, these modes correspond to Operational Conditions 1, 2, 3, and 4. However, for a Boiling Water Reactor, these modes correspond to Operational Conditions 1, 2 and 3. As a result, the requirement to maintain these valves sealed closed in Operational Condition 4 at CPS is being deleted. It should be noted that since these penetrations are considered to be secondary containment bypass leakage paths, these valves continue to be required OPERABLE when handling irradiated fuel in the secondary containment and during CORE ALTERATIONS and operations with a potential for draining the reactor vessel. These valves will continue to be sealed closed whenever PRIMARY CONTAINMENT INTEGRITY is required, consistent with TMI Action Plan Item II.E.4.2 requirements as described in Appendix D to the CPS USAR.

Action Statements "a" and "b" are being revised by deleting references to Table 3.6.4-1. Additionally, the word "primary" is being added to the TS title and Action "a" to clarify that these requirements apply to primary containment isolation valves (vs. secondary containment isolation valves,

for example). Similarly, "primary containment isolation" is being added to Action "b" for clarification. These proposed changes provide clarification and do not result in any technical change to these requirements. Further, a statement that Specification 3.0.4 does not apply to Action "b" is being added as recommended by GL 91-08. This change is similar to the exception to Specification 3.0.4 currently included under Action "a". This change will allow plant mode changes when an instrument line associated with an inoperable instrument line excess flow check PCIV is isolated, since this configuration provides adequate containment isolation protection during plant mode changes.

With respect to changes to the surveillance requirements of TS 3/4.6.4, the reference to Table 3.6.4-1 is being deleted from each of the surveillances. In addition, "primary containment" or "primary containment isolation" is being added to the surveillances, as appropriate, to clarify that the scope of these surveillances includes only primary containment isolation valves (vs. secondary containment isolation valves, for example). Further, the word "specified" is being deleted from Surveillance Requirement 4.6.4.1 since, with the deletion of Table 3.6.4-1, automatic PCIV isolation times are no longer specified. Similarly, Surveillance Requirement 4.6.4.4 is being revised to delete the word "provided" and add the word "required" since, with the deletion of Table 3.6.4-1, the instrument line excess flow check PCIV differential pressure actuation ranges are no longer provided. These proposed changes are editorial in nature and do not result in any change to the technical requirements of these surveillances.

Proposed change (15) addresses changes to Surveillance Requirement 4.6.6.1.b.3 of TS 3.6.6.1, "Secondary Containment Integrity," to make this surveillance agree with the changes proposed for Definition 1.38 as discussed under proposed change (4) above. The proposed reference to TS 3.6.6.2 avoids unnecessary entry into the Actions for TS 3.6.6.1 when the specific requirements for the inoperable damper are being met. As discussed under proposed change (3) above, this proposed change ensures that operation under the provisions of the Action Statement of TS 3.6.6.2 will not result in an unnecessary plant shutdown per TS 3.6.6.1.

Proposed change (16) addresses deletion of TS Table 3.6.6.2-1, "Secondary Containment Ventilation System Automatic Isolation Dampers." These proposed changes consist of a change to the LCO to delete reference to the dampers and isolation times listed on Table 3.6.6.2-1. These dampers and their associated isolation times are listed in CPS Procedure No. 9066.01, "Secondary Containment Isolation Damper Operability." Since these requirements are listed in a CPS surveillance procedure, they are subject to the change control program of Section 6.8 of the CPS TS. The proposed changes to this TS also include deletion of the reference to Table 3.6.6.2-1 in the Action Statement and Surveillance Requirement 4.6.6.2. Additionally, the word "specified" is being deleted from Surveillance Requirement 4.6.6.2.a since, with the deletion of Table 3.6.6.2-1, the isolation times are no longer specified. As stated above, these isolation times are specified in plant surveillance procedures. Further, Surveillance Requirement 4.6.6.2.b is being revised to clarify that the damper positions to be verified are those associated with secondary containment automatic isolation dampers (vs. main control room isolation dampers, for example) and that the containment isolation test signal used is to be a secondary containment isolation signal (vs. primary containment

isolation signal, for example). These proposed changes provide clarification, do not alter the intent of this surveillance, and do not result in any technical changes or changes to the operability or testing requirements specified per TS 3/4.6.6.2.

Proposed change (17) addresses the proposed changes to TS 3/4.8.4.1, "Containment Penetration Conductor Overcurrent Protective Devices," to delete Table 3.8.4.1-1. These proposed changes consist of a revision to the LCO to delete references to Table 3.8.4.1-1 and add new wording to specify that primary and backup devices be OPERABLE. A statement is also being added to state that the scope of these devices excludes those circuits for which credible fault currents would not exceed the electrical penetrations' design ratings. These changes are as recommended in GL 91-08.

Protection for each of the circuits currently listed on Table 3.8.4.1-1 consists of primary and backup devices, except for the low-frequency motor generator set power supply to the reactor recirculation pumps. This circuit is protected by one overcurrent protection circuit breaker. The generator itself provides the backup protection since the generator's maximum output under fault conditions is less than the penetration's design rating. This point is being included in the Bases for this TS for informational purposes.

The penetration circuits currently listed on TS Table 3.8.4.1-1 (as well as the settings for the primary protection of the polar crane circuit) are partially contained in CPS Procedure No. 9383.02, "Reactor Recirc Protective Relay Inspection, Calibration and Functional Test," and partially in CPS Procedure No. 9383.04, "Containment Penetration Lower Voltage Overcurrent Protective Device Functional Test." The combination of these two procedures provides the total list of penetration circuits currently listed on TS Table 3.8.4.1-1. These procedures are subject to the change controls of Section 6.8 of the CPS TS. In addition, USAR Section 8.3.1.4.2.4 addresses the requirements for overcurrent protection of the containment electrical penetrations.

The proposed changes to Action "a" of TS 3.8.4.1 and Surveillance Requirement 4.8.4.1 consist of deletion of the references to Table 3.8.4.1-1. In addition, the word "required" is being added to clarify that these requirements only apply to those protective devices addressed by the LCO, and not to others which may be installed in the plant. Based upon the above, the proposed changes to TS 3/4.8.4.1 are in conformance with GL 91-08.

Proposed change (19) addresses the proposed change to delete Table 3.4.8.2-1 of TS 3.8.4.2, "Motor Operated Valves Thermal Overload Protection." In order to delete Table 3.4.8.2-1, the LCO is being revised to state that it applies to valves in safety systems as recommended by GL 91-08. However, as stated in the Bases, the intent of this TS is to address compliance with Regulatory Guide 1.106, "Thermal Overload Protection for Electric Motors on Motor-Operated Valves." This regulatory guide only addresses those thermal overload devices which are integral with the motor starter. Thus, the LCO is being revised to apply only to those valves which utilize this design rather than imply that this design must be used. Additionally, the regulatory guide states that the purpose of bypassing these thermal

overload devices is to ensure that the valves perform their intended function. The directions for which valves perform active safety functions are denoted by the direction column of Table 3.8.4.2-1. As can be seen from this table, many of these valves currently have bypass devices in only one direction. Therefore, the LCO is being revised to state that the thermal overload devices are required to be bypassed in those directions for which the associated valves perform an active safety function. Further, since the safety intent of this TS is to ensure that the thermal overload devices are bypassed when the valve is required to perform an active safety function, it is unnecessary for the TS to refer to an "OPERABLE bypass device" since any means used to bypass the thermal overload protection meets the intent of the TS, regardless of whether or not the bypass device is integral with the motor starter. (A jumper installed around the thermal overload protection in accordance with 10CFR50.59, for example, would satisfy the safety requirement and thus should also satisfy the TS.) Therefore, the term "OPERABLE bypass device" has been removed from the TS. The thermal overload bypass devices listed on Table 3.8.4.2-1 are contained in CPS Procedure No. 9381.01, "MOV Thermal Overload Bypass Device Verification." This procedure is subject to the change controls of Section 6.8 of the CPS TS.

The proposed changes to the Action Statement of TS 3.8.4.2 are being made to make the Action Statement agree with the scope identified in the revised LCO. The proposed changes to the surveillance requirements are being made to make them also agree with the revised LCO, including deleting descriptions of the bypass device design. Additionally, changes to Surveillance Requirements 4.8.4.2.1. and 4.8.4.2.2 are proposed to eliminate unnecessary wording originally resulting from incorporating the Standard Technical Specifications, as further explained below.

Regulatory Guide 1.106 addresses two types of bypass device designs. The first is a design in which the thermal overload protection is continuously bypassed and temporarily placed in force only when the valve motor is undergoing periodic or maintenance testing. (This is the design for all bypass devices at CPS as currently shown on Table 3.8.4.2-1.) The second design is one in which the thermal overload protection is normally in force and bypassed only under accident conditions. The Standard Technical Specifications (on which the CPS TS was based) were structured to accommodate either design or a combination of the two. As a result, words defining the surveillance requirements for each bypass device design were included in the Standard Technical Specifications and were subsequently included in the CPS TS. Because CPS utilizes only one bypass device design, it is unnecessary to include the additional wording to differentiate between the two designs. Further, the additional wording in the CPS TS can potentially lead to confusion. These proposed changes do not result in a change to the original scope or intent of this TS. These and the above-described changes to TS 3/4.8.4.2 are consistent with GL 91-08.

Basis for No Significant Hazards Consideration

In accordance with 10CFR50.92, a proposed change to the Operating License (Technical Specifications) involves no significant hazards considerations if operation of the facility in accordance with the proposed change would not: (1) involve a significant increase in the probability or consequences

of any accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. The proposed changes are evaluated against each of these criteria below.

- (1) The proposed changes are based upon GL 91-01 and GL 91-08 and merely remove component lists or provide clarifying information. The proposed changes do not alter the scope of equipment which is currently required to be OPERABLE or subject to surveillance testing. In addition, the proposed changes do not result in any change to the plant design or operation. The proposed change to delete the requirement to maintain containment HVAC supply and exhaust isolation valves 1VR002A, B and 1VQ006A, B sealed closed in Operational Condition 4 does not alter the requirement to maintain these valves sealed closed whenever CONTAINMENT INTEGRITY is required. As a result, the proposed requirements continue to meet the intent of TMI Action Plan Item II.E.4.2 and support the safety function of primary containment. Therefore, these proposed changes cannot increase the probability or the consequences of any accident previously evaluated.
- (2) As described above, these proposed changes do not alter the scope of equipment which is currently required to be OPERABLE or subject to surveillance testing. In addition, these proposed changes do not alter the plant design or operation. As a result, no new failure modes are introduced and these proposed changes cannot create the possibility of a new or different kind of accident from any accident previously evaluated.
- (3) The proposed changes are based upon GL 91-01 and GL 91-08 and merely remove component lists or provide clarifying information. The proposed changes do not alter the scope of equipment currently required to be OPERABLE or subject to surveillance testing, nor do the proposed changes affect any instrument setpoints or equipment safety functions. The list of components being removed from TS are included in CPS procedures which are subject to the change controls of Section 6.8 of the CPS TS. These change control provisions provide an adequate means to control changes to these component lists without including them in the TS. The proposed change to delete the requirement to maintain containment HVAC supply and exhaust isolation valves 1VR002A, B and 1VQ006A, B sealed closed in Operational Condition 4 does not alter the requirement to maintain these valves sealed closed whenever CONTAINMENT INTEGRITY is required. As a result, the proposed requirements continue to meet the intent of TMI Action Plan Item II.E.4.2 and support the safety function of primary containment. As a result, these proposed changes will not result in a significant reduction in any margin of safety.

Based upon the foregoing, Illinois Power has concluded that these proposed changes do not involve a significant hazards consideration.