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JGC-461-95
October 27, 1995

Docket No. 50-461

10CFR50.90

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

Subject: Clinton Power Station Proposed Amendment of
Facility Operating License No. NPF-62 (LS-95-004)

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 Technical Specification (TS) 3.1.3, "Control Rod OPERABILITY," to include the 25% surveillance overrun allowed by Limiting Condition for Operation (LCO) 3.0.2 into the allowances of the surveillance Notes for control rod "notch" testing per Surveillance Requirement (SR) 3.1.3.2 and SR 3.1.3.3. This request also proposes a clarification to the description of TS Table 3.3.3.1-1, "Post Accident Monitoring Instrumentation," Function 7, to indicate that the Function's requirements apply to the position indication for only automatic primary containment isolation valves, rather than all primary containment isolation valves. These changes have previously been approved for the Grand Gulf Nuclear Station as part of their conversion to the Improved Standard Technical Specification format. Further, this request proposes changes to correct a number of editorial and typographical errors inadvertently contained in TS 3.3.4.1, "End of Cycle Recirculation Pump Trip (EOC-RPT) Instrumentation"; TS 3.3.6.1, "Primary Containment and Drywell Isolation Instrumentation"; TS 3.3.8.2, "Reactor Protection System (RPS) Electric Power Monitoring"; and TS 3.6.5.2, "Drywell Air Lock."

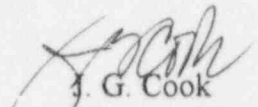
A description of the proposed changes and the associated justification (including a Basis For No Significant Hazards Consideration) are provided in Attachment 2. A marked-up copy of the affected pages from the current TS is provided in Attachment 3. A marked-up copy of the affected pages from the current Technical Specification Bases are provided in Attachment 4. Further, an affidavit supporting the facts set forth in this letter and its attachments is provided in Attachment 1. Following NRC approval of this request, IP will revise the CPS Technical Specification Bases, in accordance with the Technical Specification Bases Control Program of Technical Specification 5.5.11, to incorporate the changes identified in Attachment 4.

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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 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. G. Cook
Vice President

DAS/csm

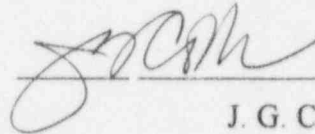
Attachments

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

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

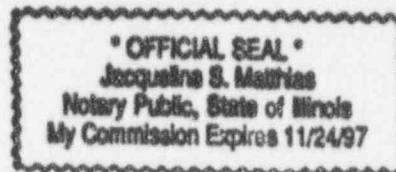
Date: This 27th day of October 1995.

Signed: _____

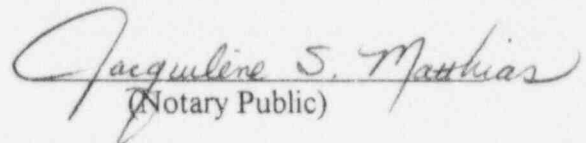


J. G. Cook

STATE OF ILLINOIS } SS.
 }
De Witt COUNTY }



Subscribed and sworn to before me this 27th day of October 1995.



(Notary Public)

Background

By Amendment No. 95 to the Clinton Power Station (CPS) Technical Specifications (TS), the NRC approved implementation of a revised set of TS in the format of NUREG-1434, "Standard Technical Specifications, General Electric Plants, BWR/6," Revision 0, September 1992, for CPS. Conversion to the format of these Improved Technical Specifications (ITS) was performed on an industry "lead-plant" basis in conjunction with the other three BWR/6 plants (i.e., Grand Gulf Nuclear Station, River Bend Station, and Perry Nuclear Power Plant). CPS was the first of the BWR/6 plants to receive NRC approval of conversion to the ITS format. The NRC has subsequently approved conversion to the ITS format for the other three BWR/6 plants. This request involves several changes to conform the CPS TS to the TS subsequently approved for other BWR/6 plants and to correct a number of administrative typographical errors in the CPS TS. Each of these changes is addressed separately below.

During the NRC's review of Entergy Operations' amendment request for the Grand Gulf Nuclear Station (GGNS), and subsequent to NRC approval of the CPS ITS amendment request, Entergy personnel identified that changes made by NUREG-1434 to the surveillance requirements (SRs) for testing control rods were overly restrictive and did not fully meet the original intent of the SRs. Specifically, Limiting Condition for Operation (LCO) 3.1.3, "Control Rod OPERABILITY," SR 3.1.3.2 and SR 3.1.3.3 address periodic "notch" testing of control rods. Prior to issuance of Amendment No. 95, the corresponding CPS TS surveillance requirement (4.1.3.1.2) required "moving each control rod at least one notch at least once per 7 days." This requirement was essentially captured in NUREG-1434 SR 3.1.3.2 and SR 3.1.3.3. However, the NUREG modified these requirements to require the control rod to be "inserted" rather than just "moved", and the test interval was increased from at least once per 7 days to at least once per 31 days for control rods that are partially withdrawn. (The test interval for fully withdrawn control rods remained the same.) This latter change is consistent with the recommendations of NRC Generic Letter 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation."

The combination of these revised requirements introduced the potential for additional unnecessary testing and administrative tracking. Since the CPS design includes 145 individual control rods, CPS tracks control rod testing by SR rather than by individual control rod (i.e., control rods that are to be tested at least once per 7 days per SR 3.1.3.2 and those that are to be tested at least once per 31 days per SR 3.1.3.3). When a control rod is moved from the partially withdrawn position to the fully withdrawn position the required Frequency changes from at least once per 31 days (per SR 3.1.3.3) to at least once per 7 days (per SR 3.1.3.2). Since the control rod would have been withdrawn to the full out position, movement of the control rod to the full out position, in and of itself, would no longer satisfy the requirement to "insert" the control rod (as opposed to the

original requirement to "move" the control rod). In addition, since the control rod would have previously been tested at a Frequency of at least once per 31 days, the control rod may not have been "inserted" within the previous 7 days. Thus, in order to satisfy the TS surveillance requirements, the control rod would have to be inserted prior to withdrawing it to the full out position.

This potential inconsistency was identified during the development of NUREG-1434. This was intended to be corrected by the addition of Notes to SR 3.1.3.2 and SR 3.1.3.3 which state that the SRs are not required to be performed until the control rod has been in the required position for a time period corresponding to the SR's Frequency. [I.e., SR 3.1.3.2 is not required to be performed until 7 days after the control rod is (fully) withdrawn and SR 3.1.3.3 is not required until 31 days after the control rod is (partially) withdrawn.] These Notes were intended to allow a control rod for which the test Frequency had changed to be tested along with the new control rod test group during the new group's next regularly scheduled test. However, SR 3.0.2 allows up to 25% extension to surveillance intervals. The Notes on SR 3.1.3.2 and SR 3.1.3.3 do not recognize the allowances of SR 3.0.2. Thus, the potential still exists for unnecessary testing of control rods whose test Frequency had changed. Therefore, the Notes associated with SR 3.1.3.2 and SR 3.1.3.3 are being revised to capture the surveillance interval plus 25% rather than just the surveillance interval.

One further change is being made to the Note associated with SR 3.1.3.2 to add the word "fully" to clarify that the time allowance of the Note begins when the control rod is fully withdrawn (i.e., the condition of the SR) rather than upon its initial (partial) withdrawal. As presently written, it could be interpreted that the 7-day clock associated with this Note is running when the control rod is partially withdrawn. This interpretation would negate the original intent of the Note similar to that described above.

The above changes were approved with issuance of the conversion to ITS for GGNS and River Bend Station (RBS) and are being proposed for CPS for consistency.

The second change involves a clarification of LCO 3.3.1.1, "Post Accident Monitoring (PAM) Instrumentation," associated with primary containment isolation valve (PCIV) position indication. Specifically, CPS TS Table 3.3.3.1-1, "Post Accident Monitoring Instrumentation," Function 7, "Penetration Flow Path, PCIV Position," is being revised to "Penetration Flow Path, Automatic PCIV Position," to clarify that this requirement involves position indication for automatic PCIVs only. This change is consistent with the Bases for this TS and with changes approved for GGNS. This change is being proposed for CPS for consistency. In addition, IP understands that RBS currently plans to submit a similar change request in the near future.

The remaining changes involve editorial corrections of typographical errors. Specifically, SR 3.3.4.1.5 Note 1 is being revised to refer to SR 3.3.4.1.6 rather than SR 3.3.4.1.7. Amendment No. 94 to the CPS TS (dated November 3, 1994) eliminated the requirement to perform manual logic system functional testing of solid-state logic independent of the automatic testing performed by the Nuclear Systems Protection Systems (NSPS) Self Test System. Because elimination of that requirement was not directly related to conversion to the ITS format, that request was processed in parallel with, but independently from, the ITS conversion amendment request. As a result, the draft ITS contained these SRs. For LCO 3.3.4.1, "End of Cycle Recirculation Pump Trip (EOC-RPT) Instrumentation," this requirement was originally included as SR 3.3.4.1.6. Upon NRC approval of Amendment No. 94, SR 3.3.4.1.6 was deleted and SR 3.3.4.1.7 was renumbered as SR 3.3.4.1.6. However, the corresponding reference to SR 3.3.4.1.7 contained in SR 3.3.4.1.5 Note 1 was overlooked. This request corrects this oversight and eliminates reference to an SR that no longer exists.

Secondly, the header for Table 3.3.6.1-1, "Primary Containment and Drywell Isolation Instrumentation," is being corrected to identify the correct number of total pages. During final typing of the CPS ITS, extra blank lines were removed and the total number of pages for Table 3.3.6.1-1 was reduced from seven to six. However, the total number of pages identified in the header for the table was not reduced from "7" to "6". This request corrects this header to indicate the correct number of total pages.

Thirdly, the alignment of the Applicability statement for LCO 3.3.8.2, "Reactor Protection System (RPS) Electric Power Monitoring," is being corrected. As stated in Section 2.5.4.b of NUMARC 93-03, "Writer's Guide for the Restructured Technical Specifications," when a single Applicability statement continues or "wraps" to a second line, the wrapped line is to be indented five spaces to indicate this. Addition of this indent is a purely editorial correction to the CPS TS.

Finally, the Notes section title block preceding the ACTIONS table of LCO 3.6.5.2, "Drywell Air Lock," is being corrected. This section is currently identified as "NOTE" when, in fact, the section contains two Notes. As a result, this section should be entitled "NOTES." This change involves a purely editorial correction to the CPS TS.

Description of Proposed Change

In accordance with 10 CFR 50.90, Illinois Power (IP) proposes the following changes to the CPS TS:

1. LCO 3.1.3, "Control Rod OPERABILITY":
 - a. The Note for SR 3.1.3.2 is being revised to state "Not required to be performed until 8 days 18 hours after the control rod is fully withdrawn . . ."

- b. The Note for SR 3.1.3.3 is being revised to state "Not required to be performed until 38 days 18 hours after the control rod is withdrawn . . ."
2. LCO 3.3.1.1, "Post Accident Monitoring (PAM) Instrumentation":
Function 7 description is being revised to "Penetration Flow Path, Automatic PCIV Position."
 3. LCO 3.3.4.1, "End of Cycle Recirculation Pump Trip (EOC-RPT) Instrumentation":
SR 3.3.4.1.5 Note 1 is being revised to refer to SR 3.3.4.1.6 rather than SR 3.3.4.1.7.
 4. LCO 3.3.6.1-1, "Primary Containment and Drywell Isolation Instrumentation":
Table 3.3.6.1-1, "Primary Containment and Drywell Isolation Instrumentation," header is being revised to reflect a total of six pages rather than seven.
 5. LCO 3.3.8.2, "Reactor Protection System (RPS) Electric Power Monitoring":
Applicability statement is being revised to indent the second line of the second Applicability statement.
 6. LCO 3.6.5.2, "Drywell Air Lock":
Notes section title block preceding the ACTIONS table is being revised to be entitled "NOTES" rather than "NOTE."

The proposed TS changes are reflected on a marked-up copy of the affected pages from the CPS TS contained in Attachment 3. In addition, changes to the CPS TS Bases, consistent with the TS changes proposed in item 1 above, have been provided in Attachment 4.

Justification for Proposed Change

The proposed changes to the SRs for LCO 3.1.3 are being made to make the SR Notes agree with their original intent. The Notes were originally intended to allow the testing of control rods to be tracked as a group, i.e., partially withdrawn and fully withdrawn. In the event that a control rod(s) has changed from one group to another, the Notes were intended to allow the next test of that control rod to be performed with the next regularly scheduled test of the new group. Since partially withdrawn control rods are required to be tested at least once per 31 days per SR 3.1.3.3, the Note for this SR states that the surveillance need not be performed until 31 days after the control rod is (partially) withdrawn. Similarly, since fully withdrawn control rods are required to be tested at least once per 7 days per SR 3.1.3.2, the Note for this SR states that the surveillance need not be performed until 7 days after the control rod is (fully) withdrawn. However, original development of these Notes failed to recognize that SR 3.0.2 allows SR Frequencies to be

extended up to 1.25 times the interval. As a result, the time allowances of these Notes may not be sufficient to allow the testing of control rods whose test Frequency had changed to be performed in conjunction with the next regularly scheduled performance of the SR. This proposed change merely adds the 25% extension to the time allowed by the Notes to make them agree with the Frequency plus the 25% extension allowed by SR 3.0.2. The addition of the word "fully" to the Note for SR 3.1.3.2 is provided to clarify that the time clock of the Note does not begin upon initial (partial) control rod withdrawal, rather it begins when the control rod is fully withdrawn, consistent with the SR. These changes are consistent with changes approved for GGNS and RBS and are being proposed for CPS for consistency.

The proposed changes to the description of Function 7 of LCO 3.3.3.1 is a clarification only. The proposed change is consistent with the Bases for this Function which states that the requirements are only applicable to automatic PCIVs. In addition, this change is consistent with changes approved for GGNS. Therefore, this change is being proposed for CPS for consistency.

The remaining proposed changes to LCO 3.3.4.1 (SR 3.3.4.1.5 Note), LCO 3.3.6.1 (Table 3.3.6.1-1 header), LCO 3.3.8.2 (Applicability statement), and LCO 3.6.5.2 (Notes section title block preceding the ACTIONS table) are purely editorial. These changes are proposed to correct typographical errors and do not involve a change to the intent of the associated requirements.

Basis for No Significant Hazards Determination

In accordance with 10 CFR 50.92, 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. Illinois Power (IP) has evaluated this request against each of these criteria and determined that the request involves no significant hazards considerations. The basis for this conclusion is presented below.

- (1) The proposed changes associated with Limiting Condition for Operation (LCO) 3.1.3 are being made to make the surveillance requirement (SR) Notes agree with their original intent. The Notes were originally intended to allow the testing of control rods to be tracked as a group, i.e., partially withdrawn and fully withdrawn. In the event that a control rod(s) has changed from one test group to another, the Notes were intended to allow performance of the next surveillance on that control rod(s) to be delayed to coincide with the next regularly scheduled performance of the test of the new group. However, these Notes failed to include

the 25% surveillance extension allowances of SR 3.0.2. This proposed change merely adds the 25% extension to the time allowed by the Notes to make them agree with the Frequency plus the extension allowance of SR 3.0.2. The addition of the word "fully" to the Note for SR 3.1.3.2 is provided for clarification only. These changes are consistent with changes approved for the Grand Gulf Nuclear Station (GGNS) and River Bend Station and are being proposed for CPS for consistency. The proposed changes do not involve a change to the control rods or control rod drive system design or operation. Further, the proposed change does not affect the way in which the associated control rod test is performed, only the "triggers" for performance of the test are affected. These triggers are being revised to make them consistent with their original intent. As a result, the proposed change cannot increase the probability or the consequences of any accident previously evaluated.

The proposed change to the description of LCO 3.3.3.1 Function 7 to include "automatic" is provided for clarification only. As described in the Bases for this Function, the requirements for operability are currently only associated with automatic primary containment isolation valves (PCIVs). As a result, this change does not involve a change to the current scope of this LCO. In addition, these changes are consistent with changes approved for GGNS and are being proposed for CPS for consistency. Since this request does not affect the design or operation of this equipment, nor does it alter the scope of this Technical Specification (TS) requirement, this proposed change cannot increase the probability or the consequences of any accident previously evaluated.

The remaining proposed changes are purely editorial and do not affect the design or operation of any equipment or alter the technical requirements of any TS. As a result, these proposed changes cannot increase the probability or the consequences of any accident previously evaluated.

- (2) The proposed changes do not affect the design or operation of any equipment. In addition, the proposed changes do not affect the manner in which any test is performed or involve a change to any plant operating mode or configuration. As a result, IP has concluded that the proposed changes cannot create the possibility of an accident not previously evaluated.
- (3) The proposed changes to the SRs for LCO 3.1.3 are being made to make the SR Notes agree with their original intent and thus permit control rods to be tested as originally intended. The proposed changes do not involve a change to the control rods or control rod drive system design or operation. Further, the proposed change does not affect the way in which this test is performed or the routine

Frequency of performing the test, only the "triggers" are affected. Since these triggers are being revised to make them consistent with their original intent, IP has determined that this change does not result in a reduction in the margin of safety.

The proposed change to the description of LCO 3.3.3.1 Function 7 to include "automatic" is provided for clarification only. As described in the Bases for this Function, the requirements for operability are currently only associated with automatic FCIVs. As a result, this change does not involve a change to the current scope of this LCO. Since this request does not affect the design or operation of this equipment, nor does it alter the scope of this TS requirement, this proposed change does not result in a reduction in the margin of safety.

The remaining changes are purely editorial and do not affect the design or operation of any equipment or alter the technical requirements of any TS. As a result, these proposed changes do not result in a reduction in the margin of safety.

Based on the foregoing, IP has concluded that this request involves no significant hazards considerations.

Attached Marked-Up
Pages of the Technical Specifications