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March 16, 1991
10CFR50.36

Docket No. 50-461

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

Subject: Clinton Power Station
Deferment of Completion of Corrective Action Described in
Previously Submitted Special Report Regarding Temporary
Inoperability of HVAC Stack High Range Radioactivity
Monitor

Dear Sir:

Clinton Power Station (CPS) Technical Specification 3.3.7.5, "Accident Monitoring Instrumentation," requires the Heating Ventilation, and Air Conditioning (HVAC) Stack High Range Radioactivity monitor to be OPERABLE while the plant is in OPERATIONAL CONDITION 1, 2, or 3. In the event the monitor becomes inoperable, the Technical Specification requires (per Action Statement 81) either the monitor be restored to OPERABLE status within 72 hours or a preplanned alternate method of monitoring the parameter be initiated and a Special Report be submitted to the Commission pursuant to Technical Specification 6.9.2 within 14 days.

In October 1991 the CPS HVAC Stack High Range Radioactivity Monitor (ORIX-PR012) was inoperable for approximately 76 hours due to extended performance of a channel calibration on the monitor. A Special Report (Reference: IP Letter U-601893, dated October 17, 1991) was subsequently submitted to the NRC in accordance with the above requirement.

Included in the Special Report was an explanation of why the calibration took an extended period of time to complete. The cause was primarily due to not devoting around-the-clock resources/attention to completing the calibration within the 72-hour allowed out-of-service time. In addition, as stated in the report, IP recognized that procedural enhancements could be made to make performance of the calibration proceed more efficiently. Consequently, IP committed to revise the calibration procedure, CPS No. 9437.64, to (1) include a precaution identifying that performance of the calibration procedure can take a significant amount of time to complete relative to the allowed out-of-service time specified in the Technical Specifications, and (2) make procedural enhancements, as appropriate, to make performance of the calibration procedure more efficient.

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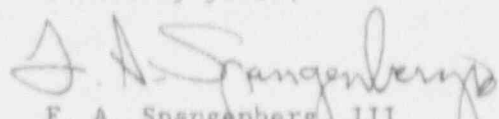
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IP stated in the Special Report that the required procedure changes would be completed by February 28, 1992. However, revision of the procedure has not yet been completed. Because of the complicated nature of the procedure and the number of technical reviewer comments which must be resolved prior to approving the proposed revision, additional time is needed to complete and issue the procedure revision.

IP now estimates that a completion date of April 30, 1992 will provide adequate time to complete the procedure revision based on the current status of the revision. IP believes this date is reasonable also in light of the fact that a refueling outage is currently underway at CPS and the ORIX-PRO12 monitor is not required to be OPERABLE (during cold shutdown/refueling conditions) until restart from the outage (which is not scheduled to occur until May 1992).

Please note that deferral of the completion date for the procedure revision has been discussed with the NRC Resident Inspector for CPS, as well as appropriate NRC Region III management personnel, and was found to be acceptable. Accordingly, this letter is a follow-up to those discussion.

Sincerely yours,


F. A. Spangenberg, III
Manager, Licensing and Safety

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