

May 29, 1992

Docket No. 50-461

Mr. Frank A. Spangenberg  
Manager - Licensing and Safety  
Clinton Power Station  
P. O. Box 678  
Mail Code V920  
Clinton, Illinois 61727

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Dear Mr. Spangenberg:

SUBJECT: STATION BLACKOUT SAFETY EVALUATION FOR CLINTON POWER STATION,  
RESPONSE TO THE STATION BLACKOUT RULE, 10 CFR 50.63 "LOSS OF ALL  
ALTERNATING CURRENT POWER" (TAC NO. M68529)

By letters dated April 16, 1989, March 30, and May 17, 1990, Illinois Power Company submitted responses to the Station Blackout (SBO) Rule, 10 CFR 50.63, "Loss of All Alternating Current Power." Enclosed is the staff's Safety Evaluation (SE) of those responses and the associated Science Applications International Corporation (SAIC) Technical Evaluation Report (TER) SAIC-91/6666, "Clinton Power Station, Station Blackout Evaluation," dated July 31, 1991 (Attachment 1 of the Enclosure).

You have proposed to use the Division III emergency diesel generator (EDG) as an alternate ac (AAC) power source and have submitted your response in the SBO generic response format. The Division III EDG only supports its dedicated bus and is not connectable to the emergency buses of the other divisions. You have not proposed any modifications to use the excess capacity of the Division III EDG to cope with a SBO event. Therefore, the Division III EDG is not classified by the NRC staff as an alternate power source and Clinton is being evaluated as a coping plant.

The staff finds, that upon the satisfactory resolution of the recommendations presented in the enclosed SE, that your responses and the proposed method of dealing with a SBO can be acceptable. You should submit, within 30 days of receipt of this SE, confirmation of the resolution of these recommendations and present a schedule for the implementation in accordance with 10 CFR 50.63(c)(4). The following areas may require follow-up inspection by the NRC to verify that the implementation of any modifications and the supporting documentation which Illinois Power may propose as a result of this evaluation are adequate to meet the SBO Rule:

- a. hardware and procedural modifications;
- b. SBO procedures in accordance with RG 1.155, Position 3.4, and NUMARC 87-00, Section 4;

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Mr. Frank A. Spangenberg

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- c. operator staffing and training to follow the identified actions in the SBO procedures;
- d. EDG reliability program which meets, as a minimum, the guidelines of RG 1.155; and, but not limited to,
- e. equipment and components required to cope with a SBO which are incorporated in a QA program that meets the guidance of RG 1.155, Appendix A; and, but not limited to,
- f. actions taken pertaining to the specific recommendations noted in the SE.

The guidance provided on Technical Specifications (TS) for a SBO states that the TS should be consistent with the Interim Commission Policy Statement on Technical Specifications. The staff has taken the initial position that TS are required for SBO response equipment. However, the question of how specifications for the SBO equipment will be applied is currently being considered generically by the staff in the context of the Technical Specification Improvement Program and remains as an open item at this time. In the interim, the staff expects plant procedures to reflect the appropriate testing and surveillance requirement to ensure the operability of the necessary SBO equipment. If the staff later determines that TS regarding the SBO equipment is warranted, you will be notified of the implementation requirements.

The attached SE contains nine recommendations and requests that you confirm implementation of these recommendations, including a schedule for their completion, within 30 days of receipt of the SE. Should you conclude that alternatives to these recommendations are more suitable, you should detail these alternatives in your response. However, further technical review may be required.

The information requested in this letter affects fewer than 10 respondents; therefore, OMB clearance is not required under Public Law 96-511.

Sincerely,

original signed by

C. E. Carpenter, Jr., Project Manager  
Project Directorate III-3  
Division of Reactor Projects III/IV/V  
Office of Nuclear Reactor Regulation

Enclosure:  
As stated

cc:  
See next page

\*See Previous Concurrence

PD3-3:LA  
PKreutzer  
05/29/92

\*PD3-3:PM  
JLombardo/bj  
05/08/92

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05/29/92

\*OGC  
JHu11  
5/13/92



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

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- a. hardware and procedural modifications;
- b. SBO procedures in accordance with RG 1.155, Position 3.4, and NUMARC 87-00, Section 4;

- c. operator staffing and training to follow the identified actions in the SBO procedures;
- d. EDG reliability program which meets, as a minimum, the guidelines of RG 1.155;
- e. equipment and components required to cope with a SBO which are incorporated in a QA program that meets the guidance of RG 1.155, Appendix A; and, but not limited to,
- f. actions taken pertaining to the specific recommendations noted in the SE.

The guidance provided on Technical Specifications (TS) for a SBO states that the TS should be consistent with the Interim Commission Policy Statement on Technical Specifications. The staff has taken the initial position that TS are required for SBO response equipment. However, the question of how specifications for the SBO equipment will be applied is currently being considered generically by the staff in the context of the Technical Specification Improvement Program and remains as an open item at this time. In the interim, the staff expects plant procedures to reflect the appropriate testing and surveillance requirement to ensure the operability of the necessary SBO equipment. If the staff later determines that TS regarding the SBO equipment is warranted, you will be notified of the implementation requirements.

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Sincerely,



C. E. Carpenter, Jr., Project Manager  
Project Directorate III-3  
Division of Reactor Projects III/IV/V  
Office of Nuclear Reactor Regulation

Enclosure:  
As stated

cc:  
See next page

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