ILLINOIS POWER

September 23, 1996

Docket No. 50-461

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

Subject: Revision of Clinton Power Station Commitment Regarding
             Emergency Core Cooling System Test Return Line Valves

Dear Madam or Sir:

This letter provides notification of a change to a commitment made by Illinois
Power (IP) in response to the NRC's "Phase 2" inspection conducted at Clinton Power
Station (CPS) for implementation of Generic Letter (GL) 89-10, "Safety-Related Motor-
Operated Valve (MOV) Testing and Surveillance." IP's commitment was docketed in its
letter to the NRC dated March 3, 1995 (IP Letter U-602399).

During the Phase 2 inspection at CPS, an issue was identified concerning MOVs
associated with the Emergency Core Cooling System (ECCS) test return lines.
Specifically, the NRC expressed concern about IP's position that, because the test return
valves are only open for very short period of time relative to the total time the associated
systems are required to be operable, the test return valves may be regarded as normally
closed valves having no safety function in the closing direction relative to ECCS
performance and the concerns of GL 89-10. Therefore, IP determined to exclude these
valves from the CPS GL 89-10 program.

As noted in the Phase 2 inspection report, the inspectors' concern was that a test
return line valve(s) would need to return to its safe position in the event that an accident
were to occur while the valve(s) was out of position during testing. The inspectors noted
that if the valves were not included in the GL 89-10 program for CPS, "it appeared that
the protection provided by the Technical Specifications to prevent an excessive number of
systems being unavailable to perform their safety function at any particular time would
[be] bypassed (by the inability of the valves to return to their safe position)."
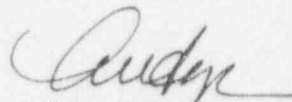
In light of the deterministic position taken by the NRC, and in lieu of including the test return valves in the CPS GL 89-10 program, IP committed to declaring the affected ECCS inoperable (and entering the applicable Technical Specification Action statement) whenever a test return valve(s) is open (during a time when the ECCS is required to be operable). Further, IP extended its commitment to include the test return valves 1E12-F024A and 1E12-F024B (for the Division 1 and 2 Residual Heat Removal/Low Pressure Coolant Injection subsystems, respectively). Although these two valves were (and still are) included in the GL 89-10 program, IP extended its commitment to include these valves on the basis of their slow stroke times in the closing direction. Consistent with the NRC's deterministic position, IP acknowledged that the valves' slow stroke times would, in the event of a LOCA, not support the ECCS injection function due to the diversion of flow through the valves during their closing time.

It should now be noted that IP is planning to modify valves 1E12-F024A and 1E12-F024B during the forthcoming refueling outage (RF-6) at CPS. These modifications will reduce the closure time for these valves such that they will be within the ECCS injection times assumed in the accident analyses (including the time allowed for starting and loading of the standby emergency diesel generators). Completion of the noted modifications will therefore obviate the need to declare the associated ECCS inoperable whenever these valves are open. Consequently, IP's commitment regarding test-return valves will no longer apply to these valves.

This situation was discussed with the NRC Licensing Project Manager for Clinton, and based on that discussion, this letter is submitted to provide notice of the change to IP's docketed commitment.

Sincerely yours,

Michael W. Lyon
Director-Licensing

TBE/csm

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