

# ILLINOIS POWER

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U-602041  
L47-92 (10-16)LP  
8E.100a

Docket No. 50-461

10CFR50.90  
JSP-0528-92  
October 16, 1992

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 and Appendix A to the Operating License (Technical Specifications), for Clinton Power Station (CPS). This request consists of proposed editorial changes to the CPS Operating License and Technical Specifications to correct typographical errors, provide clarification and remove provisions which are no longer applicable. A description of the proposed changes, the associated justifications (including a basis for No Significant Hazards Consideration), and a marked-up copy of the affected pages of the current Operating License and Technical Specifications are provided in Attachment 2. In addition, an affidavit supporting the facts set forth in this letter and its attachment is provided in Attachment 1.

IP has reviewed the proposed change 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 individual or cumulative occupational radiation exposures. Based on the foregoing, IP concludes 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. Perry  
Senior Vice President

TAB/msh  
Attachment

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

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PDR ADOCK 05000461  
P PDR

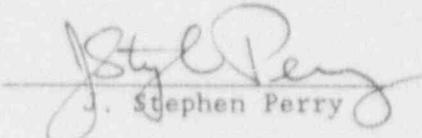
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STATE OF ILLINOIS  
COUNTY OF DEWITT

J. Stephen Perry, baing first duly sworn, deposes and says:  
That he is Senior 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.

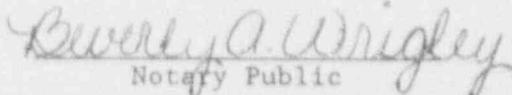
DATE: This 16 day of October 1992

Signed

  
J. Stephen Perry

Subscribed and sworn to before me this 16<sup>th</sup> day  
of October 1992.



  
Notary Public

Description of Proposed Change

In accordance with 10CFR50.90, the following editorial changes to the CPS Operating License and Technical Specifications are being proposed:

1. Delete item (b) from paragraph D of the CPS Operating License and reletter the remaining items, as appropriate. Item (b) provided exemptions from the requirements of General Design Criteria (GDC) 61 to permit the deferral of a portion of the Fuel Handling System preoperational testing until prior to off-loading fuel from the reactor vessel. Since the testing has been completed and the system declared operable, this license condition is being deleted from the Operating License.
2. Revise Technical Specification 3.5.2, "ECCS- Shutdown," item e.2 and Technical Specification 3.5.3, "Suppression Pool," item b.3 to delete the condition "equivalent to a level of 95%". Technical Specifications 3.5.2.e.2 and 3.5.3.b.3 identify the minimum required available volume in the Reactor Core Isolation Cooling (RCIC) System storage tank in the event the suppression pool level is less than the applicable limit during operational conditions 4 and 5\*. The Technical Specifications currently identify an available volume of at least 125,000 gallons of water, equivalent to a level of 95%. Since the available level instrumentation does not provide level indication in terms of percentage, this condition is being deleted from the referenced Technical Specifications.
3. Revise Technical Specification 3.8.3.2, "Distribution-Shutdown," item a.3.d to delete the "\*" attached to this item. Technical Specification Limiting Condition For Operation (LCO) 3.8.3.2.a.3 identifies the Division III AC power distribution system equipment required to be operable during shutdown conditions. Footnote "\*", which states "When handling irradiated fuel in the secondary containment," was intended to define the "\*" which appears in the LCO Applicability statement. While Technical Specification 3.8.3.2.a.3.d is applicable during the operational condition defined by "\*", it was not intended that the "\*" be attached to item a.3.d. Therefore, the "\*" is being deleted from Technical Specification 3.8.3.2.a.3.d.
4. Revise Technical Specification 3/4.9.12, "Inclined Fuel Transfer System," to delete footnote "\*\*". Delayed preoperational testing of the Fuel Handling System resulted in the addition of footnote "\*\*" to Technical Specification 3/4.9.12 to permit an exception to the operability requirements for the blocking valve in the fuel building Inclined Fuel Transfer System hydraulic power unit and the liquid level indicator prior to off-loading irradiated fuel from the reactor vessel. Since the testing has been completed and the system was declared operable, the footnote is no longer needed and is thus being deleted from the referenced Technical Specification.
5. Revise Technical Specification 6.12.3 to indicate applicability of footnote "\*\*" vice footnote "\*". Technical Specification 6.12

identifies requirements for control of high radiation areas. Footnote  
"\*\*\*" was inadvertently identified as applicable to Technical  
Specification 6.12.3 (controls for entry into areas accessible to  
personnel such that the measured dose rate is in excess of 3000  
R/hr) when it was intended that footnote "\*\*\*" be applicable to this  
specification. Therefore, Technical Specification 6.12.3 will be  
revised to indicate the applicability of footnote "\*\*\*".

#### Justification for Proposed Change

The proposed changes do not alter any of the requirements or technical bases  
provided in the CPS Operating License and Technical Specifications. All  
required actions remain unchanged and the proposed revisions delete provisions  
which are no longer applicable, provide clarification and correct previously  
identified typographical errors. Consequently, these changes are editorial  
only. The justification for each proposed change is provided below.

At the time of initial fuel loading at CPS, it was not possible to complete  
the preoperational testing of the Fuel Handling (FH) System related to the  
transfer of fuel bundles under wet loading conditions. As a result, IP  
requested an exemption to 10CFR50, Appendix A, GDC (1) to permit the deferral  
of the preoperational testing of the FH system under wet loading conditions  
until prior to off-loading irradiated fuel. This exemption, as documented in  
CPS Safety Evaluation Report Supplement 8, was included in the full-power  
Operating License for CPS. In addition, footnote "\*\*\*" was added to Technical  
Specification 3/4.9.12 to indicate that operability of portions of the FH  
system would not be required until completion of the preoperational testing  
(which would be required to be performed prior to off-loading irradiated fuel  
from the reactor vessel). Subsequent to NRC approval of the exemption, IP  
completed the testing of the FH system and the system was then declared  
operable. Completion of this testing was documented in NRC Inspection Report  
50-461/87039 dated January 24, 1988. Therefore, the footnote in Technical  
Specification 3/4.9.12 is no longer applicable, and the exemption in paragraph  
D is no longer needed. The footnote and exemption can thus be deleted. These  
changes do not delete any requirements, and in fact, make the Operating  
License and Technical Specifications consistent with the current plant status.

During a CPS-initiated safety system functional inspection, IP discovered that  
the control room surveillance log and the applicable Technical Specification  
indicate the R/IC system storage tank level should be maintained at a level  
"equivalent to 95%". The log and Technical Specification do not indicate if  
this is available volume or total volume and the percentage is not easily  
correlated with the tank level range of 0-30 feet as indicated on the  
installed level instrumentation. The purpose of the Technical Specification  
is to require a minimum available water volume of 125,000 gallons as  
specified. Therefore, since the statement "equivalent to 95%" does not  
provide the operator with any useful additional information and has been a  
point of confusion to the operators, it is proposed that the statement related  
to equivalency be deleted from the Technical Specifications. This change does  
not impact the requirement for the minimum available volume of water in the  
tank. The operators are provided with an aid to equate tank level to tank  
volume which eliminates confusion and ensures compliance with system  
requirements without the noted, confusing statement.

Technical Specification LCO 3.8.3.2.a.3 identifies the Division III AC power distribution system equipment required to be operable during shutdown conditions. Footnote "\*\*", which states "When handling irradiated fuel in the secondary containment", is provided to define the "\*" which appears in the LCO Applicability statement. The "\*" was inadvertently attached to LCO 3.8.3.2.a.3.d. Therefore, the "\*" is inappropriate and is being deleted from LCO 3.8.3.2.a.3.d. This change will not impact which equipment is required to be operable, but will eliminate confusion generated by the "\*" inappropriately being attached to the LCO.

Technical Specification 6.12 identifies the requirements for control of high radiation areas, and Technical Specification 6.12.3 provides specific controls for entry into areas accessible to personnel such that the measured dose rate is in excess of 3000 mrem/hour. Footnote "\*\*\*" is provided to indicate at what distance from the source the dose rate is to be measured. However, footnote "\*\*", which provides exceptions to the use of a radiation work permit, was inadvertently identified as applicable to Specification 6.12.3. Therefore, to provide clarification and ensure consistency between Technical Specifications 6.12.1, 6.12.2 and 6.12.3, footnote "\*" in Specification 6.12.3 is being replaced with footnote "\*\*\*". This change does not impact IP's compliance with the requirements of 10CFR20, nor does it alter any of IP's requirements or responsibilities for protection of the public and employees against radiation hazards.

#### Basis for No Significant Hazards Consideration

In accordance with 10CFR50.92, a proposed change to the Operating License (Technical Specifications) involves no significant hazards consideration 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 collectively evaluated against each of these criteria as follows:

- (1) The proposed changes only consist of clarifications, corrections of typographical errors and the deletion of provisions which are no longer applicable. Therefore, these changes do not affect any previous analysis. These changes do not affect the intent or implementation of the applicable Technical Specifications, and in fact, reduce or eliminate confusion, provide consistency between Technical Specifications, and ensure that the Operating License and Technical Specifications reflect current plant status. Since these are editorial changes which do not impact the plant design or operations, this proposed change cannot increase the probability or the consequences of any accident previously evaluated.
- (2) The proposed changes are editorial only and do not affect the plant design or operation. No new failure modes are introduced since these proposed changes only correct typographical errors and provide additional clarification. Therefore, the request will not create the possibility of a new or different kind of accident from any accident previously evaluated.

- (3) The proposed changes only provide correction of typographical errors and clarification of inconsistent direction to the operators. These changes do not alter or delete technical requirements and as such, maintain an equivalent level of safety. Therefore, these changes do not involve a reduction in a margin of safety.

Based upon the foregoing, IP concludes that the e changes not involve a significant hazard consideration.