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ILLINDIS POWER COMPANY



CLINTON POWER STATION, P.O. BOX 678. CLINTON, ILLINOIS 61727

April 21, 1986

Docket No. 50-461

Director of Nuclear Reactor Regulation Attention: Dr. W. R. Butler, Director BWR Project Directorate No. 4 Division of BWR Licensing U. S. Nuclear Regulatory Commission Washington, DC 20555

Subject: Clinton Power Station (CPS) Remote Shutdown Division II Equipment Testing SER Outstanding Licensing Issue #13

Dear Dr. Butler:

In Illinois Power (IP) Letter U-600460, dated March 10, 1986, three commitments were made to the NRC Staff relative to the following:

- Modify the Remote Shutdown system to eliminate the use of jumpers, rewiring, or disconnecting of circuits such that Division II equipment/components can be operated in compliance with NUREG-0800, Section 7.4 guidelines (to be completed prior to startup after the first refueling outage);
- Revise CPS Technical Specifications 3/4.3.7.4 to include those Division II controls and instruments necessary to satisfy the capability to achieve cold shutdown in accordance with 10CFR50, Appendix A, General Design Criterion 19 (first surveillances to be performed prior to startup from the first refueling outage); and
- Provide operator training on the procedures for remote shutdown using the Division II controls and equipment (to be completed prior to plant operation above 5% power).

The purpose of this letter is to provide the Staff with additional IP commitments relative to Division II remote shutdown testing, as required by the NRC, to complete the resolution of CPS Safety Evaluation Report Outstanding Issue No. 13 (OLI #13).

Subsequent discussions with Mr. R. Kendall and Mr. J. Calvo of the Plant Electrical, Instrumentation and Control Systems Branch indicated that in addition to these commitments, the Staff would require a one-time confirmatory test be performed using the CPS Remote Shutdown procedure (No. 4003.01) for the Division II equipment/components currently requiring such jumpering, rewiring or disconnecting of

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circuits. The Staff stated that NRC acceptance of the proposed plant modifications described in Item #1 above was contingent upon IP verifying the capability of the Division II remote shutdown method as currently configured. The Staff reviewers also noted that actual operation of the affected Division II components (e.g., pumps and valves) would not be necessary, but activation of control circuits and actuation devices to demonstrate that power is applied should be tested.

IP has evaluated the applicable steps of CPS Procedure No. 4003.01, Remote Shutdown, and has identified certain enhancements to this procedure to ensure proper circuit alignments during jumpering and rewiring of the affected Division II equipment and to minimize the potential for personnel safety hazards while operating such components using these methods. These procedure revisions are currently being implemented. In addition, in accordance with the Staff's requirements as noted above, a one-time confirmatory test of the appropriate Division II remote shutdown equipment will be performed prior to Fuel Load. Key aspects of this test are as follows:

- (1) The affected Division II remote shutdown equipment includes those components which can only be operated, in accordance with CPS No. 4003.01, using jumpers, rewiring, or disconnecting of circuits (in particular, Shutdown Service Water (SX) Pump B, Residual Heat Removal (RHR) Pump B and RHR Valve F042B, and an SX vent fan).
- (2) The proposed testing will be accomplished, in general, by deenergizing the affected components, one at a time, connecting the jumpers, etc., and then reenergizing control power to the component actuating device. Other temporary circuit alignments may be performed to ensure that actual motor operation is inhibited (i.e., pump, valve or fan actuation may be prevented).
- (3) The testing will be performed in a manner that will minimize any potential for personnel safety hazard.
- (4) The results of these tests will be documented and available at CPS for NRC confirmation, if required.

The information provided in this letter and the previously referenced letter (U-600460) is considered sufficient for the NRC Staff to completely resolve OLI #13 in Supplement #6 to the CPS Safety Evaluation Report (NUREG-0853). Please contact me if the Staff has any questions regarding these commitments.

Sincerely yours,

J. A. Spangenbergig

F. A. Spangenberg () Manager - Licensing and Safety

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cc: B. L. Siegel, NRC Clinton Licensing Project Manager NRC Resident Office Regional Administrator, Region III, USNRC Illinois Department of Nuclear Safety

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