



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 10 TO FACILITY OPERATING LICENSE NO. NPF-62
CLINTON POWER STATION, UNIT NO. 1
ILLINOIS POWER COMPANY
DOCKET NO. 50-461

1.0 INTRODUCTION

By letter dated October 30, 1987, the licensees (Illinois Power Company, et al.) proposed Technical Specification (TS) changes to Appendix A of Operating License NPF-62 for the Clinton Power Station. The proposed changes contained in Package Number 5 of Attachment 3 of the submittal were requested to account and allow credit to be taken for the redundancy of the common Central Control Terminals (CCTs), where process and radiation monitor status and indications are provided, and to clarify certain testing and surveillance requirements for process and effluent radiation monitors based on as-built capabilities and features provided in these systems.

2.0 EVALUATION

The changes proposed apply to Technical Specifications 3/4.3.7.1 (along with 4.11.2.7.1 and 4.11.2.7.2), 3/4.3.7.11, and 3/4.3.7.12. The change to Table 3/4.3.7.1-1 (Radiation Monitoring Instrumentation), Table 3/4.3.7.11-1 (Radioactive Liquid Effluent Monitoring Instrumentation), and Table 3/4.3.7.12-1 (Radioactive Gaseous Effluent Monitoring Instrumentation) are as follows:

The process radiation monitors at Clinton provide their operational information via data links to two common CCTs. The radiation monitor indication and status are provided through either of the CCTs. One CCT is located in the Main Control Room (MCR) and the other CCT is located in the Radiation Protection Office (RPO). The licensees stated in their letter that the RPO is continuously manned (24 hours a day) with telephone lines to the MCR and that these two CCTs are functionally equivalent. The staff considered in its evaluation that they are redundant CCTs with respect to verifying monitor status, checking monitor indications, and performing required surveillances on the radiation monitors.

The channel functional tests specified for certain monitors in the above tables require, among other things, the capability to remotely annunciate an alarm condition in the MCR. Since the CCT in the MCR (CCT-MCR) is

considered to be functionally equivalent to the CCT in the RPO (CCT-RPO), a new note is affixed to Table 3.3.7.1-1 as Note (b) and to Tables 3.3.7.11-1 and 3.3.7.12-1 as Note (a). This new note is added to include in the channel functional tests the capability of either the CCT-MCR or CCT-RPO to provide the alarm status of the applicable radiation monitor channels, rather than referring only to the MCR annunciation as currently specified in the Clinton TS. Inoperability of one CCT does not constitute inoperability of a monitor since the redundant CCT can provide the required status, indication, and alarm for applicable radiation monitors. Therefore, the staff finds the additions to the above tables to be acceptable.

Actions 72 and 73 for Table 3.3.7.1-1, Action 111 for Table 3.3.7.11-1, and Action 121 for Table 3.3.7.12-1 are extended to include the operability requirements for both CCTs in the event that both CCTs are inoperable and are therefore incapable of providing the required remote alarm annunciation. Since these changes to the action statements do not remove or relax any existing requirements but add the new requirements, the staff finds the extended action statements to be acceptable.

The licensees proposed a revised Table Notation (1) to Table 4.3.7.1-1 (Radioactive Liquid Effluent Monitoring Instrumentation Surveillance Requirements) to reflect the as-built capabilities and design features provided in the liquid effluent radiation monitors. The current Clinton TS (Item 4 in Table Notation 1) states that automatic isolation of liquid effluent is to occur with "Instrument Controls not set in Operate Mode." The licensees' proposed change clarifies this item to read "Instrument Control not set in Normal Operate Mode (uninitialized, calibrate, maintenance, or standby)." The discrepancy between specific system design features and the current Clinton TS is due to an oversight at the time the Clinton TS was drafted. This change does not remove or relax the currently existing requirements but clarifies the requirement to reflect the specific design features. Therefore, the staff finds this change to be acceptable.

The changes proposed for Tables 3.3.7.12-1 (Radioactive Gaseous Effluent Monitoring Instrumentation) and 4.3.7.12-1 (Radioactive Gaseous Effluent Monitoring Instrumentation Surveillance Requirements) are editorial in nature and are to provide consistent nomenclature for the station heating, ventilation, and air conditioning (HVAC) exhaust process radiation monitor (PRM) and the standby gas treatment system exhaust PRM. The staff finds the changes to be acceptable.

Action Statement 72 for Pre-Treatment Off-Gas PRM in Table 3.3.7.1-1 (Radiation Monitoring Instrumentation) currently states that "...gases from the main condenser off-gas treatment system may be released to the environment for up to 72 hours provided..." This Action Statement is not specific as to what actions should be taken after the 72-hour limit since the limiting condition for operation (LCO) in the same section also specifies that the provision of Specifications 3.0.3 and 3.0.4 are not applicable. Thus, no further action (reactor shutdown) is required if the 72-hour limit is exceeded. To rectify this discrepancy, the licensees proposed to delete the 72-hour limit requirement and instead to insert a

new provision (3) stating "Grab samples are taken at least once per 8 hours and analyzed for gross noble gas activity within 4 hours..." (until this monitor becomes operational). In addition to this monitor, there is a downstream detector (plant effluent monitor) which monitors the gaseous radioactive effluent through the pre-treatment off-gas monitor to the environment. Therefore, the staff finds the licensees' proposed changes to be acceptable.

As a direct result of this change, a phrase is added to Surveillance Sections 4.11.2.7.1 and 4.11.2.7.2: "...required to be operable as otherwise provided by Table 3.3.7.1". This addition provides consistency with the operational requirements of the pre-treatment off-gas process radiation monitor.

Based on the above evaluation, the staff concludes that the proposed changes concerning operability requirements for process and effluent radiation monitors are acceptable. The bases for the staff's acceptance are that the proposed changes (1) do not remove any existing requirements while providing adequate clarification and (2) meet the appropriate guidelines of the General Electric Standard TS (NUREG-0123, Revision 3, dated December 1980).

3.0 ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32, and 51.35, an environmental assessment and finding of no significant impact has been prepared and published (53 FR 35132) in the Federal Register on September 9, 1988. Accordingly, based upon the environmental assessment, the Commission has determined that the issuance of this amendment will not have a significant effect on the quality of the human environment.

4.0 CONCLUSION

We have concluded, based on the considerations discussed above, that:
(1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and
(2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Dated: September 14, 1988