TABLE 3.3.2-1 (Continued)

CRVICS INSTRUMENTATION

TRIP FUNCTION	ISOLATION SIGNAL ††	MINIMUM OPERABLE CHANNELS PER TRIP SYSTEM	APPLICABLE OPERATIONAL CONDITION	ACTION
1. Main Steam Line Radiation - High	C	2(a)	1, 2, 3	23
m. Fuel Building Exhaust Radiation - High	(b)(f)(j)	2(a)	1, 2, 3 #	25 25
n. Manual Initiation	R(b)(f)	1	1, 2, 3 #	26 25

2. MAIN STEAM LINE ISOLATION †	ISOLATION SIGNAL	APPLICABLE TABLE NOTES	APPLICABLE OPERATIONAL CONDITIONS	ACTION
a. Reactor Vessel Water Level-Low Low Low, Level 1	U	NA	1, 2, 3	20
b. Main Steam Line Radiation - High	C	d	1, 2, 3	23
c. Main Steam Line Pressure - Low	H	NA	1	23
d. Main Steam Line Flow - High	D	NA	1, 2, 3	23
e. Condenser Vacuum - Low	J	NA	1, 2**, 3**	23
f. Main Steam Line Tunnel Temp. - High	E	NA	1, 2, 3	23
g. Main Steam Line Tunnel Δ Temp. - High	F	NA	1, 2, 3	23
h. Main Steam Line Turbine Bldg. Temp. - High	G	NA	1, 2, 3	23
i. Manual Initiation	R	NA	1, 2, 3	22

m

TABLE 3.3.2-1 (Continued)

CRVICS INSTRUMENTATION

TABLE NOTATIONS

\# When handling irradiated fuel in the primary or secondary containment and during CORE ALTERATIONS and operations with a potential for draining the reactor vessel.

* With any control rod withdrawn. Not applicable to control rods removed per Specification 3.9.10.1 or 3.9.10.2.

** When any turbine stop valve is greater than 95% open or the reactor mode switch is in the run position.

† Main steam line isolation trip functions have 2-out-of-4 isolation logic except for the main steam line flow - high trip function which has 2-out-of-4 isolation logic for each main steam line.

†† See Specification 3.6.4 Table 3.6.4-1 for valves which are actuated by these isolation signals.

(a) A channel may be placed in an inoperable status for up to 2 hours for required surveillance without placing the trip system in the tripped condition provided at least one other OPERABLE channel in the same trip system is monitoring that parameter.

(b) Also actuates the standby gas treatment system.

(c) Deleted

(d) Also trips and isolates the mechanical vacuum pumps.

(e) Isolates RWCU valves 1G33-F001 and 1G33-F004 only.

(f) Also actuates secondary containment ventilation isolation dampers per Table 3.6.6.2-1.

(g) Manual Switch closes RWCU system inboard isolation valves F001, F028, F053, F040 and outboard isolation valves F004, F039, F034 and F054.

(h) Vacuum breaker isolation valves require RCIC system steam supply pressure low coincident with drywell pressure high for isolation of vacuum breaker isolation valves.

(i) A single manual isolation switch isolates outboard steam supply line isolation valve (F064) and the RCIC pump suction from suppression pool valve (F031) only following a manual or automatic (Reactor Vessel Water Level 2) RCIC system initiation.

(j) Only actuates secondary containment ventilation isolation dampers per Table 3.6.6.2-1. Note †† is not applicable to this Trip Function.

(k) A channel may be placed in an inoperable status for up to 2 hours for required surveillance without placing the trip system in the trip condition provided that the redundant trip system is OPERABLE and monitoring that parameter.

(l) Not required to be OPERABLE when valves 1VR002A,B and 1VR008A,B are sealed closed in accordance with Specification 3.6.4.

(m) Each channel consists of five temperature modules and their associated Sensors. A Channel is OPERABLE if and only if five temperature modules and their associated Sensors are OPERABLE.

PACKAGE NUMBER 2

Description and Justification of Proposed Change

Illinois Power is requesting a change to Technical Specification 4.1.3.3.b.1.b to revise the setpoint requirements for the control rod scram accumulator low pressure alarm from 1520 +30, -0 psig to greater than or equal to 1520 psig. This change is proposed because the upper limit imposed on the setpoint is an unnecessary restriction in view of the fact that a setpoint of greater than or equal to 1520 psig is conservative. In addition, the alarm setpoints for some Barksdale Model No. BIT-GH32SS pressure switches used in the BWR5/BWR6 Hydraulic Control Units (HCUs) have demonstrated a tendency to drift in an upward (conservative) direction to as-found values in excess of the specified upper limits.

There is no safety basis for including an upper limit in the Technical Specifications for the pressure switch setpoints. The alarm setpoint was established to alert plant personnel of decreased pressure in the HCU scram accumulators. Adequate accumulator pressure must be maintained to ensure that the scram accumulators retain sufficient stored energy to ensure a successful scram (especially at low reactor pressure). Any setpoint above the minimum setpoint of 1520 psig is conservative with respect to alarming upon a low pressure condition; therefore it is inappropriate to impose an upper limit in the Technical Specifications for the alarm setpoint. Removing the upper limit currently specified in the Technical Specifications is consistent with the recommendations prescribed in General Electric Service Information Letter No. 429.

Scram accumulator pressure, as indicated by the associated pressure gauges, will continue to be verified at least once per 7 days in accordance with Technical Specification 4.1.3.3.a.

Basis For No Significant Hazards Consideration

According to 10CFR50.92, a proposed change to the 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 an accident previously evaluated, (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.

(1) The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated because the HCU accumulator pressure switch setpoints would be acceptable only if the as-found values were greater than or equal to the minimum value established from a safety standpoint. The proposed change is consistent with instrument characteristics and in accordance with vendor recommendations. The proposed change does not involve a change to the minimum required scram accumulator pressure itself. In addition, the pressure check required at least once per 7 days by the current Technical Specification will not be affected by the proposed change and will continue to be performed as required.

(2) Due to its limited scope, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated. The impact of the proposed change is limited only to its potential impact on accumulator operability and therefore scram capability. This impact was previously evaluated (above).

(3) The proposed change does not involve a significant reduction in a margin of safety because the proposed change does not change the minimum acceptable accumulator pressure setpoint. Higher setpoints are conservative as there is no basis to impose an upper limit. The proposed change will not impact the minimum accumulator pressure required to ensure sufficient energy for a reactor scram under any reactor pressure conditions. The original basis for establishing a minimum accumulator pressure setpoint remains unchanged.

REACTIVITY CONTROL SYSTEMS

CONTROL ROD SCRAM ACCUMULATORS

LIMITING CONDITION FOR OPERATION (Continued)

3.1.3.3 ACTION (Continued):

2. With more than one withdrawn control rod with the associated scram accumulator inoperable or with no control rod drive pump operating, immediately place the reactor mode switch in the Shutdown position.

c. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.1.3.3 Each control rod scram accumulator shall be determined OPERABLE:

a. At least once per 7 days by verifying that the indicated pressure is greater than or equal to 1520 psig, unless the control rod is inserted and disarmed or scrammed.

b. At least once per 18 months by:

1. Performance of a:

a) CHANNEL FUNCTIONAL TEST of the leak detectors and

b) CHANNEL CALIBRATION of the pressure detectors and verification of an alarm setpoint of ~~1520 +30, -0~~ greater than or equal to 1520 psig on decreasing pressure.

PACKAGE NUMBER 3

Description and Justification of Proposed Change

The purpose of this Technical Specification change request is to delete the requirement for the Chlorine Detection System as described in Specifications 3/4.3.7.8, 4.7.2.e.2 (including the "**" footnote on page 3/4 7-5), and BASES Section 3/4.3.7.8. This request is based on the fact that the chlorine hazard is being removed from the site. Specifically, all liquid chlorine will be removed from the site, and there are no other significant depots of chlorine within a five mile radius of the site. Furthermore, there is negligible transportation of chlorine in the vicinity of the site. IP is pursuing this change request in parallel with the removal of chlorine from the site. Therefore, IP recommends that a footnote be added to the appropriate Technical Specifications that states, "This Specification is not applicable after all chlorine containers having a capacity of 100 pounds or greater are removed from the site including the chlorine containers located at the site sewage treatment plant."

IP is in compliance with Regulatory Guide 1.78, "Assumptions for Evaluating the Habitability of a Nuclear Power Plant Control Room During a Postulated Hazardous Chemical Release" and Regulatory Guide 1.95, "Protection of Nuclear Power Plant Control Room Operators Against an Accidental Chlorine Release" by maintaining an operable Chlorine Detection System. IP's compliance is necessitated by the presence of liquid chlorine on site for water treatment purposes. This system is described in Section 6.4.4.2 of the Final Safety Analysis Report (FSAR). The results of the NRC's acceptance of the design are provided in the Safety Evaluation Report (SER), NUREG-0853 and its supplements.

IP intends to replace the existing chlorination system on site with a sodium hypochlorite or equivalent system that obviates the use of liquid chlorine for water treatment. The only other location within a five-mile radius of the control room in which chlorine is stored is at the site sewage treatment plant. IP is also proceeding with replacement of the existing liquid chlorine system at the sewage treatment plant with a sodium hypochlorite or equivalent system. As a result, the threat to control room habitability from an accidental release of chlorine on site will be removed.

Regulatory Guide 1.78 states that if hazardous chemicals, such as chlorine, are frequently shipped by routes within a five-mile radius of the plant, consideration should be given to such shipments (as a potential hazard) in the evaluation of the control room habitability. The transportation survey last performed for Clinton (1985) indicated an annual truck and rail shipment frequency for chlorine of zero and 17 respectively. This is considerably less than the threshold limits of 10 and 30 shipments by truck and rail, respectively, as stated in Regulatory Guide 1.78. Therefore, transportation of chlorine gas in the immediate vicinity does not pose a threat to control room habitability and chlorine monitors are not necessitated by this concern. In IP letter U-600175, dated July 9, 1985, IP committed to perform a transportation survey every 3 years in order to detect any changes in hazardous material shipping patterns.

Basis For No Significant Hazards Consideration

According to 10CFR50.92, a proposed change to the 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 an accident previously evaluated, (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.

(1) The proposed change does no involve a significant increase in the probability or consequences of an accident previously evaluated because deleting the OPERABILITY and Surveillance requirements for the chlorine detection system is contingent upon the removal of all major depots or storage tanks of chlorine that constitute a hazard as described in Regulatory Position C.1 of Regulatory Guide 1.78. This, in conjunction with the negligible risk associated with a transportation accident in the vicinity of Clinton (as determined according to the guidelines of Regulatory Position C.2 of Reg. Guide 1.78), makes the probability or consequences of a chlorine accident negligible for Clinton.

(2) The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated because the associated plant modification for converting to a sodium hypochlorite or equivalent system only affects the means by which the water is chlorinated and has no direct impact on the design or operation of plant systems other than the chlorination system itself.

(3) The proposed change does not involve a significant reduction in a margin of safety because the margin of safety with respect to a chlorine gas release has been maximized by removal of chlorine gas from the site. The only safety contribution of the chlorine detection system was in the detection of a chlorine release. With no chlorine source present, deletion of the chlorine detection system can not affect the margin of safety.

INSTRUMENTATION

CHLORINE DETECTION SYSTEM

LIMITING CONDITION FOR OPERATION

3.3.7.8 Two independent chlorine detection channels shall be OPERABLE with their trip setpoints adjusted to actuate at a chlorine concentration of $\leq$ 5 ppm.

APPLICABILITY: All OPERATIONAL CONDITIONS and *.#

ACTION:

a. With one chlorine detection channel inoperable, restore the inoperable detection channel to OPERABLE status within 7 days, or within the next 6 hours, initiate and maintain operation of at least one control room emergency filtration system subsystem in the chlorine mode of operation.

b. With both chlorine detection channels inoperable, within 1 hour initiate and maintain operation of at least one control room emergency filtration system subsystem in the chlorine mode of operation.

c. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.7.8 Each of the above required chlorine detection channels shall be demonstrated OPERABLE by performance of a:

a. CHANNEL CHECK at least once per 12 hours,
b. CHANNEL FUNCTIONAL TEST at least once per 31 days, and
c. CHANNEL CALIBRATION at least once per 18 months.

*When irradiated fuel is being handled in the secondary containment.

This Specification is not applicable after all chlorine containers having a capacity of 100 pounds or greater are removed from the site including the chlorine containers located at the site sewage treatment plant.

PLANT SYSTEMS

CONTROL ROOM VENTILATION SYSTEM

SURVEILLANCE REQUIREMENTS (Continued)

4.7.2 (Continued)

d. After every 720 hours of charcoal adsorber operation, by verifying within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978*, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978*, for a methyl iodide penetration of less than 0.175% for the makeup filter system carbon adsorber and 6% for the recirculation filter system carbon adsorber when tested; in accordance with ASTM D3803-79 methods, with the following parameters:

Make Up Filter System

a)	Bed Depth	- 4 inches
b)	Velocity	- 40 fpm
c)	Temperature	- 30°C
d)	Relative Humidity	- 70%

Recirculation Filter System

a)	Bed Depth	- 2 inches
b)	Velocity	- 80 fpm
c)	Temperature	- 30°C
d)	Relative Humidity	- 70%

e. At least once per 18 months by:

1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6 inches Water Gauge while operating the makeup filter system at a flow rate of 3000 cfm ± 10%.
2. Verifying that on a high chlorine actuation** and a manual initiation test signal, the system automatically** switches to the chlorine mode of operation and the dampers close within 2 seconds. ***
3. Verifying that the control room leak rate is limited to ≤ 4000 cfm ± 10% at ≥ 1/8-inch Water Gauge (W.G.) with respect to adjacent areas.
4. Verifying that on a smoke mode actuation test signal, the system automatically switches to the smoke mode of operation at a flow rate less than or equal to 64,000 cfm ± 10%.
5. Verifying that on a high radiation actuation test signal, the system automatically switches to the high radiation mode of operation and

*ANSI N510-1980 shall be used in place of ANSI N510-1975 as referenced in Regulatory Guide 1.52, Revision 2, March 1978.

Automatic transfer to the chlorine mode is not required when chlorine containers having a capacity of 150 pounds or less are stored 100 meters from the control room or its fresh air inlets. *

insert attached

*** This Specification is not applicable after all chlorine containers having a capacity of 100 pounds or greater are removed from the site including the chlorine containers located at the site sewage treatment plant.

3/4.3.7.7 TRAVERSING IN-CORE PROBE SYSTEM (Continued)

by comparing the detector(s) output with data obtained during the previous LPRM calibrations.

3/4.3.7.8 CHLORINE DETECTION SYSTEM

The OPERABILITY of the chlorine detection system ensures that an accidental chlorine release will be detected promptly and the necessary protective actions will be automatically initiated to provide protection for control room personnel. Automatic transfer to the chlorine mode is not required when chlorine containers having a capacity of 150 pounds or less are stored 100 meters or more from the control room or its fresh air inlets. Upon detection of a high concentration of chlorine, the control room ventilation system will automatically be placed in the chlorine mode of operation to provide the required protection. The detection systems required by this specification are consistent with the recommendations of Regulatory Guide 1.95, "Protection of Nuclear Power Plant Control Room Operators Against an Accidental Chlorine Release," January, 1977. *

3/4.3.7.9 FIRE DETECTION INSTRUMENTATION

Deleted

3/4.3.7.10 LOOSE-PART DETECTION SYSTEM

The OPERABILITY of the loose-part detection system ensures that sufficient capability is available to detect loose metallic parts in the primary system and avoid or mitigate damage to primary system components. The allowable out-of-service times and surveillance requirements are consistent with the recommendations of Regulatory Guide 1.133, "Loose-Part Detection Program for the Primary System of Light-Water-Cooled Reactors," May 1981.

* - This Specification is not applicable after all chlorine containers having a capacity of 100 pounds or greater are removed from the site including the chlorine containers located at the site sewage treatment plant.

PACKAGE NUMBER 4

Description and Justification of Proposed Change

CPS Technical Specification 3.3.7.5 (Table 3.3.7.5-1), "Accident Monitoring Instrumentation," specifies OPERABILITY requirements for the Drywell/Containment Hydrogen and Oxygen Concentration Analyzers/Monitors (from here on referred to simply as "the monitors") including ACTION to be taken if one or more of the monitors are inoperable. Illinois Power proposes to revise the ACTION specified in Table 3.3.7.5-1 for the monitors such that the ACTION is consistent with the guidance provided in NRC Generic Letter 83-36.

The ACTION that is currently specified in the CPS Technical Specifications for the monitors (ACTION "80") is applicable to a large number of the instruments listed on Table 3.3.7.5-1. ACTION "80" states that with the number of OPERABLE channels (monitors) less than the Required Number of Channels shown in Table 3.3.7.5-1, the inoperable channels (monitors) must be restored to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours. It further states that with the number of OPERABLE channels (monitors) less than the Minimum Channels OPERABLE requirements of Table 3.3.7.5-1, the inoperable channels (monitors) must be restored to OPERABLE status within 48 hours or be in at least HOT SHUTDOWN within the next 12 hours.

The above ACTION, however, is not what was recommended for a "hydrogen concentration analyzer(s) and monitor(s)" by Generic Letter 83-36 issued November 1, 1983 (Subject: NUREG-0737 TECHNICAL SPECIFICATIONS). Enclosure 3 of the Generic Letter contained samples of recommended Technical Specifications in Standard Technical Specification format which included a sample table (Table 3.3.7.5-1) on which the accident monitoring instrumentation and associated ACTIONs were listed. The ACTION recommended for an inoperable hydrogen monitor(s) (designated as ACTION "82" in Generic Letter 83-36) reads as follows:

a. With the number of OPERABLE channels one less than the required number of channels shown in Table 3.3.7.5-1, restore the inoperable channel to OPERABLE status within 30 days or be in at least HOT SHUTDOWN within the next 12 hours.

b. With the number of OPERABLE channels less than the minimum channels OPERABLE requirements of Table 3.3.7.5-1, restore at least one channel to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours.

With respect to the instrumentation listed in the sample table of the Generic Letter, this ACTION was listed only against the hydrogen monitor(s); therefore, for the proposed change, this ACTION is proposed only for the hydrogen/oxygen monitor(s) listed in Table 3.3.7.5-1 of the Clinton Technical Specifications.* The ACTION will be incorporated as a new ACTION ("83") to be

* At Clinton, each oxygen/hydrogen concentration analyzer/monitor is an integral unit. The ACTION recommended by Generic Letter 83-36 for the hydrogen concentration analyzer/monitor(s) is assumed to be applicable to the integrated oxygen/hydrogen concentration analyzer/monitor units listed in the CPS Technical Specifications.

listed on Clinton Technical Specification page 3/4 3-88. Incorporation of the proposed change will then make the CPS Technical Specification consistent with that recommended by the Generic Letter.

Basis For No Significant Hazards Consideration

According to 10CFR50.92, a proposed change to the 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 an accident previously evaluated, (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.

(1) Although the proposed change would increase the allowed out-of-service time for the hydrogen/oxygen monitors, the proposed Technical Specification (ACTION statement) is consistent with the Specification recommended by Generic Letter 83-36 which was issued to provide guidance for the Technical Specifications considered appropriate for the accident monitoring instrumentation installed in response to NUREG-0737. The proposed change therefore should not involve a significant increase in the probability or consequences of an accident previously evaluated.

(2) The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed change does not involve any changes to plant design. The impact of the proposed change is limited only to the out-of-service time allowed for the hydrogen/oxygen monitors which perform only a monitoring function. The proposed change does not impact the operation of any other plant systems or components.

(3) The proposed change does not involve a significant reduction in a margin of safety since the change does not involve any changes to setpoints or limits associated with any margin of safety assumed or required by a safety analysis. If the availability of the hydrogen/oxygen monitors is considered to be a margin of safety, then the impact on availability due to the increased allowed out-of-service times under the proposed change must be considered to be acceptable, since the proposed change is consistent with the Technical Specification proposed under Generic Letter 83-36.

TABLE 3.3.7.5-1

ACCIDENT MONITORING INSTRUMENTATION

INSTRUMENT	REQUIRED NUMBER OF CHANNELS	MINIMUM CHANNELS OPERABLE	APPLICABLE OPERATIONAL CONDITIONS	ACTION
1. Reactor Vessel Pressure	2	1	1, 2, 3	80
2. Reactor Vessel Water Level	2	1	1, 2, 3	80
3. Suppression Pool Water Level	4	2	1, 2, 3	80
4. Suppression Pool Water Temperature	2/quadrant†	1/quadrant†	1, 2, 3	80
5. Drywell Pressure	2	1	1, 2, 3	80
6. Drywell Air Temperature	2	1	1, 2, 3	80
7. Drywell/Containment Hydrogen and Oxygen Concentration Analyzer and Monitor	2/division	1/division	1, 2, 3	80
8. Containment Pressure ##	2	1	1, 2, 3	80
9. Containment Temperature	1/valve***	1/valve***	1, 2, 3	80
10. Safety/Relief Valve Acoustic Monitor	4**	2*	1, 2, 3	81
11. Containment/Drywell High Range Gross Gamma Radiation Monitors	1	1	1, 2, 3	81
12. HVAC Stack High Range Radioactivity Monitor#	1	1	1, 2, 3	81
13. SGTS Exhaust High Range Radioactivity Monitor#	2/valve	1/valve	1, 2, 3	82
14. Primary Containment Isolation Valve Position Indication ††				

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TABLE NOTATIONS

* One each for containment and drywell.
** Two each for containment and drywell.
*** Thermocouples in the SRV discharge line can serve as backup to the acoustic tail pipe monitors indication should one channel of the position indication become inoperable.
\# High range noble gas monitors and iodine/particulate sampler.
For Divisions I and II only.
† These instruments monitor suppression pool water temperature when pool water level is below instruments of Specification 3.5.3.1.
†† One channel consists of the open limit switch, and the other channel consists of the closed limit switch for each automatic isolation valve in Table 3.6.4-1 Part 1, "Automatic Isolation Valves."

TABLE 3.3.7.5-1 (Continued)

ACCIDENT MONITORING INSTRUMENTATION

ACTION

ACTION 80 -

a. With the number of OPERABLE accident monitoring instrumentation channels less than the Required Number of Channels shown in Table 3.3.7.5-1, restore the inoperable channel(s) to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours.

b. With the number of OPERABLE accident monitoring instrumentation channels less than the Minimum Channels OPERABLE requirements of Table 3.3.7.5-1, restore the inoperable channel(s) to OPERABLE status within 48 hours or be in at least HOT SHUTDOWN within the next 12 hours.

ACTION 81 - With the number of OPERABLE Channels less than required by the Minimum Channels OPERABLE requirement, either restore the inoperable Channel(s) to OPERABLE status within 72 hours, or:

a. Initiate the preplanned alternate method of monitoring the appropriate parameter(s), and

b. Prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 14 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

ACTION 82 -

a. With the number of OPERABLE accident monitoring instrumentation channels less than the Required Number of Channels shown in Table 3.3.7.5-1, verify the valve(s) position by use of alternate indication methods; restore the inoperable channel(s) to OPERABLE status within 30 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

b. With the number of OPERABLE accident monitoring instrumentation channels less than the Minimum Channels OPERABLE requirements of Table 3.3.7.5-1, verify the valve(s) position by use of alternate indication methods; restore the inoperable channel(s) to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

ACTION 83 - Attached

ACTION 83 -

a. With the number of OPERABLE channels one less than the required number of channels shown in Table 3.3.7.5-1, restore the inoperable channel to OPERABLE status within 30 days or be in at least HOT SHUTDOWN within the next 12 hours.

b. With the number of OPERABLE channels less then the minimum channels OPERABLE requirements of Table 3.3.7.5-1, restore at least one channel to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours.

PACKAGE NUMBER 5

Description and Justification of Proposed Change

This package consists of several proposed changes regarding Note "c" on Table 4.11.2-1 of the Clinton Technical Specifications. Each of the proposed changes, as indicated on the attached marked-up pages from the CPS Technical Specifications, are discussed in greater detail as follows.

Note "c" is attached to the monthly sampling and analysis requirements for the "Station HVAC Exhaust." The note imposes (in addition to the normal periodic monthly sampling and analysis) an additional requirement or trigger for performing sampling and analysis "following shutdown, startup, or a THERMAL POWER change exceeding 15% of RATED THERMAL POWER within a 1-hour period." After reviewing the same note in other NRC approved plant Technical Specifications and discussing the intent of this note with the NRC Project Manager for Clinton (J. Stevens) and technical reviewer (W. Meinke) on April 11, 1988, it was determined that an additional provision should be included in the note similar to the provision specified in Note "g" of the same table. Clinton therefore proposes the following change to Note "c" of Technical Specification Table 4.11.2-1 (the new wording to be added to the note is underlined):

> [c]Sampling and analysis shall also be performed following shutdown, startup, or a THERMAL POWER change exceeding 15% of RATED THERMAL POWER within a 1-hour period <u>if: (1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the primary coolant has increased more than a factor of 3, and (2) the noble gas monitor shows that effluent activity has increased by more than a factor of 3</u>.

The intent is that both notes should contain the provisional exclusion which effectively states that the additional requirement (of performing sampling and analysis following a plant shutdown, startup or a THERMAL POWER change exceeding 15% of RATED THERMAL POWER within a 1-hour period) is not applicable if DOSE EQUIVALENT I-131 concentration in the reactor coolant has not increased by more than a factor of 3 or the noble gas monitor shows that effluent activity has not increased by more than a factor 3.

The provisional exclusion is applicable to both notes because the extra associated sampling and analysis requirements are triggered for the same conditions and the same reason: to trigger additional sampling and analysis if conditions are such that fuel leaks or cladding failures may be suspected as associated with the iodine spiking phenomenon. Such occurrences, which may be indicated by an observed increase in the offgas activity level along with a determined increase in the DOSE EQUIVALENT I-131 concentration, would most likely be observed during a THERMAL POWER change or following a plant startup or shutdown. The extra sampling and analyses should not therefore be required if no significant increase in DOSE EQUIVALENT I-131 or offgas activity level has been indicated.

An additional change is proposed for Note "c" concerning the sampling and analysis for tritium. Discussions with the aforementioned NRC personnel and other utilities have confirmed that the requirements of Note "c" are not applicable to tritium because significant increases in the level of tritium are not expected or associated with the iodine spiking phenomenon indicative of fuel leaks or cladding failures. Due to the current format of Table 4.11.2-1 in the Clinton Technical Specifications, it appears that the requirements of Note "c" include sampling and analysis for tritium. Since it has been determined that this is not the intent of the Technical Specification, a change to Table 4.11.2-1 is proposed to separate Note "c" and Note "e" as shown. (Note "e" is applicable to tritium while Note "c" is not.)

Basis For No Significant Hazards Consideration

According to 10CFR50.92, a proposed change to the 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 an accident previously evaluated, (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.

(1) The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed exclusion to the particular testing (i.e., specially triggered isotopic analysis of the HVAC Common Stack effluent) is only allowed when conditions are such that the iodine spiking phenomenon is not indicated. The change to the table format (i.e., separating Notes "c" and "e") is an administrative change proposed to clarify existing requirements and does not change the intent of the Specification.

(2) The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed changes introduce no changes to plant design or operation of the facility.

(3) The proposed changes do not involve a significant reduction in a margin of safety because, as noted above, they are consistent with the intent of the Technical Specifications and yet eliminate unnecessary sampling and analyses which would otherwise appear to be required without the proposed changes. The proposed changes do not eliminate any testing that should be performed if a fuel problem (i.e., iodine spiking occurrence) is indicated. Eliminating unnecessary testing reduces the risks associated with human error, potentially reduces exposure to personnel, and allows efforts to be devoted to other areas of greater concern.

TABLE 4.11.2-1 (Continued)

RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM

TABLE NOTATIONS (Continued)

[b] The principal gamma emitters for which the LLD specification applies include the following radionuclides: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135, and Xe-138 in noble gas releases and Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, I-131, Cs-134, Cs-137, Ce-141 and Ce-144 in iodine and particulate releases. This list does not mean that only these nuclides are to be considered. Other gamma peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Semiannual Radioactive Effluent Release Report pursuant to Specification 6.9.1.7 in the format outlined in Regulatory Guide 1.21, Appendix B, Revision 1, June 1974.

[c] Sampling and analysis shall also be performed following shutdown, startup, or a THERMAL POWER change exceeding 15% of RATED THERMAL POWER within a 1-hour period if: (1) analysis shows that the DOSE (GO TO ATTACHED)

[d] Not applicable.

[e] Tritium grab samples shall be taken at least once per 7 days from the ventilation exhaust from the spent fuel pool area, whenever spent fuel is in the spent fuel pool.

[f] The ratio of the sample flow rate to the sampled stream flow rate shall be known for the time period covered by each dose or dose rate calculation made in accordance with Specifications 3.11.2.1, 3.11.2.2 and 3.11.2.3.

[g] Samples shall be changed at least once per 7 days and analyses shall be completed within 48 hours after changing, or after removal from sampler. Sampling shall also be performed at least once per 24 hours for at least 7 days following each shutdown, startup, or THERMAL POWER change exceeding 15% of RATED THERMAL POWER in 1-hour period and analyses shall be completed within 48 hours of changing. When samples collected for 24 hours are analyzed, the corresponding LLDs may be increased by a factor of 10. This requirement does apply if: (1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the primary coolant has increased more than a factor of 3, and (2) the noble gas monitor shows that effluent activity has increased more than a factor of 3.

(Note "c" continued)

EQUIVALENT I-131 concentration in the primary coolant has increased more than a factor of 3, and (2) the noble gas monitor shows that effluent activity has increased more than a factor of 3.

TABLE 4.11.2-1

RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM

GASEOUS RELEASE TYPE	SAMPLING FREQUENCY	MINIMUM ANALYSIS FREQUENCY	TYPE OF ACTIVITY ANALYSIS	LOWER LIMIT OF DETECTION (LLD)[a] (μCi/ml)
A. Station HVAC Exhaust	M[c,e] Grab Sample	M[c,e]	Principal Gamma Emitters[b]	1×10^{-4}
	M[e]	M[e]	H-3	1×10^{-6}
B. Standby Gas Treatment System Exhaust, when flow exists	M Grab Sample	M	Principal Gamma Emitters[b]	1×10^{-4}
			H-3	1×10^{-6}
C. All release Types as Listed in A and B above	Continuous[f]	W[g] Charcoal Sample	I-131 I-133	1×10^{-12} 1×10^{-10}
	Continuous[f]	W[g] Particulate Sample	Principal Gamma Emitters[b] (I-131, others)	1×10^{-11}
	Continuous[f]	M Composite Particulate Sample	Gross Alpha	1×10^{-11}
	Continuous[f]	Q Composite Particulate Sample	Sr-89, Sr-90	1×10^{-11}