

ILLINOIS POWER COMPANY



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

March 10, 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
Remote Shutdown-Technical Specifications
Outstanding Issue No. 13

Dear Dr. Butler:

Illinois Power has had several discussions with members of your staff to resolve the Staff's concerns regarding the Clinton Power Station Technical Specification for the Remote Shutdown System. In several discussions with Mr. R. Kendall of the Plant Electrical, Instrumentation and Control Systems Branch, Illinois Power agreed to revise the Clinton Technical Specifications 3/4.3.7.4 and include those Division II controls and instruments necessary to satisfy the capability to reach safe shutdown in accordance with 10CFR50, Appendix A, General Design Criteria (GDC) 19 requirements. This commitment, however, will require certain plant modifications (i.e., to eliminate the use of jumpers, rewiring, or disconnecting circuits) such that the Division II components can be operated in accordance with the guidance offered in NUREG-0800, the Standard Review Plan (SRP), Section 7.4. Any required modifications will be implemented prior to startup from the first scheduled refueling outage.

Illinois Power believes that the likelihood for requiring shutdown using Division II equipment is extremely low given that the conditions leading to such a shutdown would involve both a fire (Safe Shutdown capability accepted: SSER-3, 9.5.5) in the main control room and the complete loss of Division I electrical power (off-site and on-site). Since the Clinton Technical Specifications already contain the requirements for Division I equipment and controls, we request that the implementation of Technical Specification requirements for Limiting Conditions for Operation and Surveillances for the Division II components, necessary to fulfill the Staff's requirements, be deferred until startup from the first refueling outage. In the unlikely event that remote shutdown using Division II equipment would be required, local operation of appropriate valves can be performed manually and operation of 4160 VAC pumps, requiring additional and more complex actions can be operated with adherence to plant procedures. Prior to plant operation above 5% of rated reactor power, CPS operators will be

8603120175 860310
PDR ADOCK 05000461
E PDR

Boo1
/10

trained on the procedures for remote shutdown using Division II controls and equipment (including the precautions for local operation of controls currently requiring jumpering, rewiring, or disconnecting circuits). This training will include class room sessions and practical field applications but will not involve actual energizing/exercising of equipment. Such actions are considered unnecessary to fulfill the training objectives and could potentially lead to unwarranted safety hazards to plant equipment and personnel.

The information provided herein should be sufficient for the Staff to resolve CPS Outstanding Licensing Issue No. 13 in Supplement #6 to the Safety Evaluation Report. Please contact me if additional information is needed.

Sincerely yours,



F. A. Spangenberg
Manager - Licensing and Safety

PJT/ckc

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