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ILLINOIS POWER COMPANY



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

April 16, 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
Power Ascension Program Acceleration

Dear Dr. Butler:

In letter U-600424, dated February 5, 1986, Illinois Power Company (IP) submitted detailed justifications to the NRC pertaining to the Clinton Power Station (CPS) Power Ascension Program Acceleration (PAPA) test modifications. The purpose of this letter is to formally submit the attached addendum information on PAPA test package STP 8.0, "Control Rod Sequence Exchange Test Deletion," as requested by Mr. M. McCoy of the Reactor Systems Branch, Division of BWR Licensing. The addendum provides examples of startup test programs that have successfully performed sequence exchanges using the General Electric Company proprietary procedures. These examples demonstrate that core limits are not exceeded during control rod sequence exchanges in the 35-50% power range. It is anticipated that the application of rod sequence exchange procedures used in the implementation of Preconditioning Interim Operating Management Recommendations at CPS will result in similar margins to thermal limits. IP is prepared to discuss the addendum with cognizant NRC personnel or to provide additional information if necessary.

Sincerely yours,

A handwritten signature in dark ink, appearing to read 'F. A. Spangenberg'.

F. A. Spangenberg
Manager - Licensing and Safety

TLR/ckc

Attachment

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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Attachment

STARTUP TEST 8.0 - CONTROL ROD SEQUENCE EXCHANGE
JUSTIFY TEST DELETION

Addendum:

The reference document identifies specific procedures which have been widely used during startup test programs to successfully perform sequence exchanges. Table 1 lists the most recent startup tests where the control rod sequence exchange methods outlined in the reference were used. For all ten units, the acceptance criteria were consistently satisfied (thermal limits compliance and Preconditioning Interim Operating Management Recommendations (PCIOMR) threshold power compliance) for the sequence exchange test. As a further example of the use of the recommendations in the reference, the LaSalle County Nuclear Station Units 1 and 2 have successfully demonstrated the "row-by-row" and "column-by-column" sequence exchange methods during approximately 10-12 sequence exchanges during the operation of Units 1 and 2. These examples of the use of the recommended sequence exchange procedures provide adequate assurance that the procedures are generically applicable and that the objectives of Startup Test Procedure 8.0 will be met while using the recommended procedures.

Therefore, the generic procedures have been successfully demonstrated and assure that core limits are not exceeded during sequence exchanges at power.

Reference: "Preconditioning Interim Operating Management Recommendations," General Electric Company
Proprietary, February 1982
(NEDE-21493, Revision 5).

STARTUP TEST 8.0 - CONTROL ROD SEQUENCE EXCHANGE
JUSTIFY TEST DELETION

Table 1

Control Rod Sequence Exchange Procedure Demonstrations
Recent Startup Test Programs

Plant

Fukushima-6
Chinshan-1,2
Hatch-2
LaSalle-1,2
Susquehanna-1
Kuosheng-1,2
Leibstadt