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John P. McElwain  
Chief Nuclear Officer

U-603247  
8E.100a

August 23, 1999

Docket No. 50-461

10CFR50.90

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555

Subject: Clinton Power Station Proposed Amendment of  
Facility Operating License No. NPF-62 (LA-99-009)  
Involving Deletion of Obsolete License Conditions

Dear Madam or Sir:

Pursuant to 10 CFR 50.90, Illinois Power (IP) hereby requests amendment of Facility Operating License No. NPF-62 for Clinton Power Station (CPS). IP requests review and approval of various administrative changes involving the deletion of certain license conditions currently contained in the Operating License that are obsolete and no longer apply.

The proposed changes are purely administrative in nature and no physical or operational changes to the facility will result. A description of each of the changes is included in Enclosure 2. Also included in Enclosure 2 is the basis for no significant hazards consideration and environmental impact consideration for the proposed changes. A mark-up of the CPS Operating License reflecting the proposed license amendment is included in Enclosure 3.

Sincerely yours,

John P. McElwain  
Chief Nuclear Officer

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JLP/krk

Enclosures

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cc: NRC Clinton Licensing Project Manager  
Regional Administrator, USNRC Region III  
NRC Resident Office, V-690  
Illinois Department of Nuclear Safety

AFFIRMATION

John P. McElwain, being first duly sworn, deposes and says: That he is Chief Nuclear Officer for Clinton Power Station; that this application for amendment of Facility Operating License No. NPF-62 has been prepared under his supervision and direction; that he knows the contents thereof; and that the letter and the statements made and the facts contained therein are true and correct to the best of his knowledge and belief.

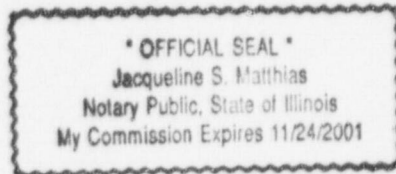
Date: This 23 day of August 1999.

Signed: John P. McElwain  
John P. McElwain  
Chief Nuclear Officer

STATE OF ILLINOIS

Dewitt COUNTY

SS.



Subscribed and sworn to before me this 23<sup>rd</sup> day of August 1999.

Jacqueline S. Matthias  
(Notary Public)



Administrative Amendment Involving Deletion of Obsolete License Conditions

Proposed Changes

The proposed changes to the CPS Operating License No. NPF-62 involve the deletion of license conditions that were imposed at the time CPS received its low and full power operating licenses. In several cases, Illinois Power has submitted letters requesting removal of some of the conditions. In all applicable cases, the original commitments have been fulfilled and no longer warrant a license condition.

Each license condition to be deleted is addressed below. Specifically, each condition is identified (quoted) and for each one, justification for the deletion is provided, including (where applicable) identification of the documents/correspondence previously provided to close the particular condition. A basis for no significant hazards consideration and environment impact evaluation, for all of the proposed changes, is provided at the conclusion of this enclosure.

License Condition 2.C (1)

License Condition 2.C (1) reads as follows:

(1) Maximum Power Level

IP is authorized to operate the facility at reactor core power levels not in excess of 2894 megawatts thermal (100 percent rated power) in accordance with the conditions specified herein. The items identified in Attachment 1 to this license shall be completed as specified. Attachment 1 is hereby incorporated into this license.

Attachment 1 contains the following conditions:

1. Preoperational test PTP-FH, Fuel Handling System, shall be completed prior to off-loading irradiated fuel.
2. IP shall resolve audibility problems encountered on evacuation of personnel in high noise areas in accordance with IP letter dated July 8, 1986. A survey of high noise areas shall be completed within 30 days after achieving maximum anticipated noise level. All corrective actions required by the survey shall be completed prior to the completion of the first refueling outage. In the interim for those areas which are identified as having deficient siren audibility, temporary administrative measures will be taken to ensure that these areas are evacuated as required.



Requested change: IP requests that License Condition 2.C (1) be revised to delete the last two sentences that refer to Attachment 1. Also, Attachment 1 should be deleted in its entirety.

Justification for request: The first item was closed in NRC Inspection Report No. 50-461/87039(DRP) which stated that:

“During this report period, the licensee completed the last deferred test activity. The inspector reviewed completed test summary for deferred testing of the Inclined Fuel Transfer System (PTP-FH-01). This review verified that test results were reviewed and approved in accordance with the licensee's program. Based on the completion of all deferred test activities that had been granted schedular exemptions as detailed in paragraph 2.D. of the Clinton Power Station Operating License, this item is closed.”

The second item was resolved in NRC Inspection Report No. 50-461/89014(DRP) which stated that:

“The remaining commitments were to conduct surveys of high noise areas during the startup test program and complete all necessary corrective actions prior to the end of the first refueling outage. The inspectors reviewed Maintenance Work Requests (MWRs) C50374, C40941, C55233, and D00329 as well as Field Problem Report 201794, and Field Alteration CQF001. In some areas of the plant the licensee was unable to provide adequate public address coverage due to high noise. For those areas a sign was installed at the entrances stating "CAUTION LIMITED GAITRONICS AREA USE ALTERNATE COMMUNICATIONS." The inspectors noted that no training commitments were in place to ensure plant personnel were trained on the meaning of the signs and the actions they should take if working in the high noise areas. The licensee provided Memorandum Y-210673 which committed to add training on the meaning and use of the signs to their training program. Based on the licensee's commitment this item is closed.”

Based on the fact that these items were closed in the referenced NRC Inspection Reports, these conditions have been fully satisfied and the license conditions are no longer warranted.

License Condition 2.C (4)

License Condition 2.C (4) reads as follows:

(4) Control System Failures (Section 7.7.3.1, SER and SSER 6)

IP shall submit, in accordance with commitments contained in letters dated May 15, 1986 and July 16, 1986, the results of the additional evaluations of control system failures and the proposed implementation of any corrective actions that may be found necessary, for staff review four months prior to plant startup after the first refueling outage. Implementation of any corrective actions found acceptable by the staff shall be completed prior to plant startup after the first refueling outage.

Requested change: IP requests that License Condition 2.C (4) be deleted in its entirety.

Justification for request: On November 18, 1988, IP submitted letter U-601311 to document completion of this action and to request closure of the license condition. Based on the fact that this condition has been fulfilled, this license condition is no longer warranted.

License Condition 2.C (6)

License Condition 2.C (6) reads as follows:

(6) Plant Operation Experience (Section 13.1.2.1, SSER 5)

IP shall have a licensed senior operator on each shift who has had at least 6 months of hot operating experience on a large commercial BWR, including at least 6 weeks at power levels greater than 20 percent of full power, and who has had BWR startup and shutdown experience. This license condition shall be effective for a period of 1 year from fuel load or until the attainment of a nominal 100 percent power level, whichever occurs later.

Requested change: IP requests that License Condition 2.C (6) be deleted in its entirety.

Justification for request: IP submitted a request in letter U-601118 dated February 5, 1988, to delete this condition. The basis for deleting this condition was due to fuel loading being completed on October 21, 1986 and 100 percent reactor power being reached on September 15, 1987. Therefore, both of the dates to which this license condition was to be effective have passed. The NRC issued License Amendment 41 on July 30, 1990, wherein the NRC confirmed that the license condition is no longer applicable and that deletion of the condition is acceptable. However, the text in the Operating License itself was not updated.

License Condition 2.C (7)

License Condition 2.C (7) reads as follows:

(7) Emergency Planning (Section 13.3, SSER 6)

In the event the NRC staff finds that the lack of progress in completion of the procedures in the Federal Emergency Management Agency's final rule, 44 CFR Part 350, is an indication that a major substantive problem exists in achieving or maintaining an adequate state of emergency preparedness, the provisions of 10 CFR Section 50.54(s)(2) will apply.

Requested change: IP requests that this condition be deleted in its entirety.

Justification for request: This condition was intended to be applied until FEMA accepted and issued its final approval of the CPS offsite emergency plan. On August 5, 1987, FEMA submitted letters to the NRC Executive Director for Operations and to the Governor of Illinois indicating FEMA's approval of State and local preparedness. Based on the fact that this condition has been fulfilled, this license condition is no longer warranted.

License Condition 2.C (8)

License Condition 2.C (8) reads as follows:

(8) Post-Fuel Loading Initial Test Program (Section 14, SER, SSER 5 and SSER 6)

Any changes to the initial test program described in Section 14 of the FSAR made in accordance with the provisions of 10 CFR 50.59 shall be reported in accordance with 50.59(b) within one month of such change.

Request change: IP requests that this license condition be deleted in its entirety.

Justification for request: The initial test program at CPS has been completed. (CPS is currently operating in Cycle 7.) Thus, this condition is no longer applicable and is not warranted.



License Condition 2.C (9)

License Condition 2.C (9) reads as follows:

- (9) Emergency Response Capabilities (Generic Letter 82-33, Supplement 1 to NUREG-0737, Section 7.5.3.1, SSER 5, and Section 18, SER, SSER 5, and Safety Evaluation Dated April 17, 1987)
- a. IP in accordance with the commitment contained in a letter dated December 11, 1986, shall install and have operational separate power sources for each of the fuel zone level channels as provided for in Regulatory Guide 1.97 prior to startup following the first refueling outage.
  - b. IP shall submit a detailed control room design final supplemental summary report within 90 days of issuance of the full power license that completes all the remaining items identified in Section 18.3 of the Safety Evaluation dated April 17, 1987.

Requested change: Delete the above license condition in its entirety.

Justification for request: The first item was addressed in NRC Inspection Report No. 50-461/89017(DRS) which states that:

“Open Item (50-461/86017-07): Verify that separate class 1E power supplies have been provided for both fuel zone level channels. The installation and upgrade of fuel zone level instruments was controlled by plant modification NB-18 which was completed during this outage. This item is considered closed.”

With regard to the second item, IP submitted the required report in letter U-601360 dated January 27, 1989. In a followup letter, U-601417 dated April 14, 1989, IP stated that all actions associated with this license condition had been completed, and requested eliminating the condition. The NRC completed its review and issued a safety evaluation report dated June 8, 1990, accepting IP's review. However, the license condition was not removed.

Since the required actions for both items associated with this license condition have been completed this license condition is no longer warranted.

Basis for No Significant Hazards Consideration

In accordance with 10 CFR 50.92, a proposed change to the operating license 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 any 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.

The proposed changes, i.e., revising or deleting license conditions that are obsolete and no longer warranted, have been evaluated against each of these three criteria and it has been determined that the changes do not involve a significant hazard because:

- (1) The proposed activity does not involve a significant increase in the probability or consequences of any accident previously evaluated.

The proposed changes delete various license conditions each of which has been fulfilled and no longer warrants a license condition. As such, the changes are purely administrative in nature, and involve no physical or operational changes to the facility. The initial conditions and methodologies used in the accident analyses consequently remain unchanged. Further, the proposed changes do not change or alter the design assumptions for the systems or components used to mitigate the consequences of an accident. Therefore, accident analyses results are not impacted. On this basis, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- (2) The proposed activity does not create the possibility of a new or different kind of accident from any accident previously evaluated.

As noted above, the proposed changes are purely administrative and involve no physical or operational changes to the facility. As such, the proposed changes do not affect the design or operation of any system, structure, or component in the plant. The safety functions of the related structures, systems, or components are not changed in any manner, nor is the reliability of any structures, systems or components reduced. No new or different type of equipment will be installed, and consequently, no new failure modes are introduced. Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any previously evaluated.

- (3) The proposed activity does not involve a significant reduction in the margin of safety.

The proposed changes are administrative in nature and have no impact on the margin of safety of any Technical Specification. There is no impact on safety limits or limiting safety system settings. The changes do not affect any plant safety parameters or setpoints. All active/applicable license conditions set forth in the CPS Operating License will remain in effect, and no physical or operational changes to the facility will result from these changes. Therefore, the proposed changes do not involve a significant reduction in the margin of safety.

Based upon the above analysis, the proposed changes will not increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident previously evaluated, or involve a reduction in a margin of safety. Therefore, the proposed changes meet the requirements of 10 CFR 50.92(c) and involve no significant hazards consideration.

#### Environmental Impact Consideration

The proposed license amendment was evaluated against the criteria of 10 CFR 51.22 for environmental considerations. Since the proposed changes are strictly administrative in nature and involve no change to the design or operation of the facility, the proposed changes (1) do not significantly increase individual or cumulative occupational exposures, (2) do not significantly change the types or significantly increase the amounts of effluents that may be released off site, and (3) as discussed in this attachment, do not involve a significant hazards consideration. Considering the foregoing, it has been concluded that the proposed changes meet the criteria given in 10 CFR 51.22(c)(9) for categorical exclusion from the requirement for an Environmental Impact Statement.



**MARKED-UP PAGES OF THE CPS OPERATING LICENSE FOR  
AMENDMENT INVOLVING  
DELETION OF OBSOLETE LICENSE CONDITIONS**



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

ILLINOIS POWER COMPANY

DOCKET NO. 50-461

CLINTON POWER STATION, UNIT NO. 1

FACILITY OPERATING LICENSE

License No. NPF-62

1. The Nuclear Regulatory Commission (the Commission or the NRC) has found that:
  - A. The application for license filed by Illinois Power Company (IP), complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I, and all required notifications to other agencies or bodies have been duly made;
  - B. Construction of the Clinton Power Station, Unit No. 1 (the facility) has been substantially completed in conformity with Construction Permit No. CPPR-137 and the application, as amended, the provisions of the Act and the regulations of the Commission;
  - C. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the regulations of the Commission (except as exempted from compliance in Section 2.D. below);
  - D. There is reasonable assurance: (i) that the activities authorized by this operating license can be conducted without endangering the health and safety of the public; and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I (except as exempted from compliance in Section 2.D below);
  - E. Illinois Power Company is technically qualified to engage in the activities authorized by this operating license in accordance with the Commission's regulations set forth in 10 CFR Chapter I;
  - F. IP has satisfied the applicable provisions of 10 CFR Part 140, "Financial Protection Requirements and Indemnity Agreements," of the Commission's regulations;

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CLINTON POWER STATION

- G. The issuance of this license will not be inimical to the common defense and security or to the health and safety of the public;
  - H. After weighing the environmental, economic, technical, and other benefits of the facility against environmental and other costs and considering available alternatives, the issuance of Facility Operating License No. NPF-62, subject to the conditions for protection of the environment set forth in the Environmental Protection Plan attached as Appendix B, is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied; and
  - I. The receipt, possession, and use of source, byproduct, and special nuclear material as authorized by this license will be in accordance with the Commission's regulations in 10 CFR Parts 30, 40, and 70.
2. Based on the foregoing findings regarding this facility, and pursuant to approval by the Nuclear Regulatory Commission at a meeting on April 10, 1987, Facility Operating License No. NPF-62, which supersedes the license for fuel loading and low power testing, License No. NPF-55, issued on September 29, 1986, is hereby issued to Illinois Power company to read as follows:
- A. This license applies to the Clinton Power Station, Unit No. 1, a boiling water nuclear reactor and associated equipment (the facility), owned by Illinois Power Company. The facility is located in Harp Township, DeWitt County, approximately six miles east of the city of Clinton in east-central Illinois and is described in the licensee's Final Safety Analysis Report, as supplemented and amended, and in the licensee's Environmental Report-Operating License Stage, as supplemented and amended.
  - B. Subject to the condition and requirements incorporated herein, the Commission hereby licenses:
    - (1) Illinois Power Company (IP), pursuant to Section 103 of the Act and 10 CFR Part 50, to possess, use and operate the facility at the designated location in Harp Township, DeWitt County, Illinois, in accordance with the procedures and limitations set forth in this license;
    - (2) Deleted
    - (3) IP, pursuant to the Act and 10 CFR Part 70, to receive, possess and to use at any time special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Final Safety Analysis Report, as supplemented and amended;



- (4) IP, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
- (5) IP, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (6) IP, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

IP is authorized to operate the facility at reactor core power levels not in excess of 2894 megawatts thermal (100 percent rated power) in accordance with the conditions specified herein.

The items identified in Attachment 1 to this license shall be completed as specified. Attachment 1 is hereby incorporated into this license.

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated into this license. IP shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

(3) Antitrust Conditions

IP shall comply with the antitrust conditions in Appendix C attached hereto, which is hereby incorporated into this license.

(4) Control System Failures (Section 7.7.3.1, SER and SSER 6)\*

IP shall submit, in accordance with commitments contained in letters dated May 15, 1986 and July 16, 1986, the results of the additional evaluations of control system failures and the proposed implementation of any corrective actions that may be found necessary, for staff review four months prior to plant startup after the first refueling outage. Implementation of any corrective actions found acceptable by the staff shall be completed prior to plant startup after the first refueling outage.

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(5) New Fuel Storage (Section 9.1.1, SER, SSER 6 and SSER 7)

IP shall store new fuel assemblies in accordance with the requirements specified in Attachment 2. Attachment 2 is hereby incorporated into this license.

(6) Plant Operation Experience (Section 13.1.2.1, SSER 5)

IP shall have a licensed senior operator on each shift who has had at least 6 months of hot operating experience on a large commercial BWR, including at least 6 weeks at power levels greater than 20 percent of full power, and who has had BWR startup and shutdown experience. This license condition shall be effective for a period of 1 year from fuel load or until the attainment of a nominal 100 percent power level, whichever occurs later.

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(7) Emergency Planning (Section 13.3, SSER 6)

In the event the NRC staff finds that the lack of progress in completion of the procedures in the Federal Emergency Management Agency's final rule, 44 CFR Part 350, is an indication that a major substantive problem exists in achieving or maintaining an adequate state of emergency preparedness, the provisions of 10 CFR Section 50.54(s)(2) will apply.

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\*The parenthetical notation following the title of many license conditions denotes the section of the Safety Evaluation Report and/or its supplements wherein the license condition is discussed.

(8) Post-Fuel Loading Initial Test Program (Section 14, SER, SSER 5 and SSER 6)

Any changes to the initial test program described in Section 14 of the FSAR made in accordance with the provisions of 10 CFR 50.59 shall be reported in accordance with 50.59(b) within one month of such change.

Deleted

(9) Emergency Response Capabilities (Generic Letter 82-33, Supplement 1 to NUREG-0737, Section 7.5.3.1, SSER 5 and SSER 8, and Section 18, SER, SSER 5 and Safety Evaluation Dated April 17, 1987)

- a. IP in accordance with the commitment contained in a letter dated December 11, 1986, shall install and have operational separate power sources for each of the fuel zone level channels as provided for in Regulatory Guide 1.97 prior to startup following the first refueling outage.
- b. IP shall submit a detailed control room design final supplemental summary report within 90 days of issuance of the full power license that completes all the remaining items identified in Section 18.3 of the Safety Evaluation dated April 17, 1987.

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- D. The facility requires exemptions from certain requirements of 10 CFR Part 50 and 10 CFR Part 70. These include: (a) an exemption from the requirements of 10 CFR 70.24 for the criticality alarm monitors around the fuel storage area; (b) an exemption from the requirement of 10 CFR Part 50, Appendix J - Option B, paragraph III.B, exempting the measured leakage rates from the main steam isolation valves from inclusion in the combined leak rate for local leak rate tests (Section 6.2.6 of SSER 6); and (c) an exemption from the requirements of paragraph III.B of Option B of 10 CFR Part 50, Appendix J, exempting leakage from the valve packing and the body-to-bonnet seal of valve IE51-F374 associated with containment penetration IMC-44 from inclusion in the combined leakage rate for penetrations and valves subject to Type B and C tests (SER supporting Amendment 62 to Facility Operating License No. NPF-62). The special circumstances regarding each exemption, except for Item (a) above, are identified in the referenced section of the safety evaluation report and the supplements thereto.



An exemption was previously granted pursuant to 10 CFR 70.24. The exemption was granted with NRC material license No. SNM-1886, issued November 27, 1985, and relieved IP from the requirement of having a criticality alarm system. IP is hereby exempted from the criticality alarm system provision of 10 CFR 70.24 so far as this section applies to the storage of fuel assemblies held under this license.

These exemptions are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security. The exemptions in items (b) and (c) above are granted pursuant to 10 CFR 50.12. With these exemptions, the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.

- E. IP shall fully implement and maintain in effect all provisions of the Commission-approved physical security plan, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Clinton Power Station Physical Security Plan," with revisions submitted through May 27, 1993; "Clinton Power Station Training and Qualification Plan," with revisions submitted through May 27, 1993; and "Clinton Power Station Safeguards Contingency Plan," with revisions submitted through May 27, 1993. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein;
- F. IP shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report as amended, for the Clinton Power Station, Unit No. 1, and as approved in the Safety Evaluation Report (NUREG-0853) dated February 1982 and Supplement Nos. 1 thru 8 thereto subject to the following provision:
- IP may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.
- G. Except as otherwise provided in the Technical Specifications or Environmental Protection Plan, IP shall report any violations of the requirements contained in Section 2.C of this license in the following manner: initial notification shall be made within 24 hours to the NRC Operations Center via the Emergency Notification System with written followup within thirty days in accordance with the procedures described in 10 CFR 50.73(b), (c), and (e).

- H. IP shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.
- I. This license is effective as of the date of issuance and shall expire at midnight on September 29, 2026.

FOR THE NUCLEAR REGULATORY COMMISSION

Original signed by:

Thomas E. Murley, Director  
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Attachments 1 and 2
- 2. Appendix A - Technical Specifications (NUREG-1235)
- 3. Appendix B - Environmental Protection Plan
- 4. Appendix C - Antitrust Conditions

Date of Issuance: April 17, 1987

ATTACHMENT 1  
TO NPF-62

Prior to achieving the milestone indicated, the following items shall be completed to the satisfaction of Region III.

1. Preoperational test PTP-FH, Fuel Handling System, shall be completed prior to off-loading irradiated fuel.
2. IP shall resolve audibility problems encountered on evacuation of personnel in high noise areas in accordance with IP letter dated July 8, 1986. A survey of high noise areas shall be completed within 30 days after achieving maximum anticipated noise level. All corrective actions required by the survey shall be completed prior to the completion of the first refueling outage. In the interim for those areas which are identified as having deficient siren audibility, temporary administrative measures will be taken to ensure that these areas are evacuated as required.

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