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U-602982
8E.100a
April 27, 1998

Docket No. 50-461

10CFR50.90

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

Subject: Application for Amendment of Facility Operating License
No. NPF-62 for Clinton Power Station (LS-98-006)

Document Control Desk:

Pursuant to 10CFR50.90, Illinois Power (IP) hereby applies for amendment of Facility Operating License No. NPF-62, Appendix A - Technical Specifications (TS), for Clinton Power Station (CPS). This request consists of proposed changes necessary to implement management changes occurring in the Operations organization at CPS. Specifically, the requested changes are to implement a change from the title of "shift supervisor" to that of "shift manager" for the position identified in TS 5.1.2 and TS 5.2.2.g. The "shift manager" position retains all the responsibilities as described in TS 5.1.2.

A description of the proposed changes and associated justification (including a Basis For No Significant Hazards Consideration) are provided in Attachment 2. A marked-up copy of the affected pages from the current TS is provided in Attachment 3. In addition, an affidavit supporting the facts set forth in this letter and its attachments is provided in Attachment 1.

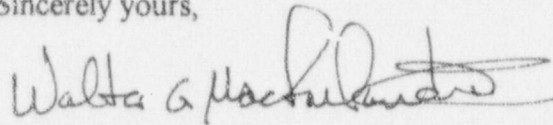
IP has reviewed the proposed changes against the criteria of 10CFR51.22 for categorical exclusion from environmental impact considerations. The proposed changes do not involve a significant hazards consideration, or significantly increase the amounts or change the types of effluents that may be released offsite, nor do they significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, IP

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concludes that the proposed changes meet the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Walter G. MacFarland, IV". The signature is fluid and cursive, with a prominent initial "W" and a long, sweeping underline.

Walter G. MacFarland, IV
Senior Vice President and
Chief Nuclear Officer

JFK/mlh

Attachments

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

Walter G. MacFarland, IV, being first duly sworn, deposes and says: That he is Senior Vice President and Chief Nuclear Officer of Illinois Power; that this application for amendment of Facility Operating License NPF-62 has been prepared under his supervision and direction; that he knows the contents thereof; and that to the best of his knowledge and belief said letter and the facts contained therein are true and correct.

Date: This 27th day of April, 1998.

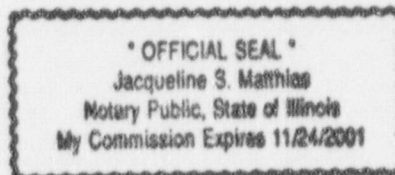
Signed: Walter G. MacFarland, IV

Walter G. MacFarland, IV

STATE OF ILLINOIS

} SS.

Dewitt COUNTY



Subscribed and sworn to before me this 27th day of April, 1998.

Jacqueline S. Matthias
(Notary Public)

Background

As noted in ANSI/ANS 3.1-1978, "American National Standard for Selection and Training of Nuclear Power Plant Personnel," the personnel of the operating organization who have the responsibility for the safe and efficient operation of a nuclear power plant throughout its operational lifetime must understand the complexities of the plant design and must be capable of properly manipulating the plant controls and maintaining and repairing the plant equipment. The selection of the operating and support personnel for nuclear power plants and the training of these personnel to provide sound judgment, based on knowledge and experience of nuclear and power plant systems, are essential to the safe and successful operation of these plants.

Illinois Power is implementing a new management organization at Clinton Power Station (CPS). The new organization re-assigns responsibilities in the Operations, Engineering, Work Control, Training, and Nuclear Safety and Performance Improvement departments. For example, some of the support functions previously held within the Operations department will be re-assigned among the above named departments. The management organization change was evaluated at CPS under the 10CFR50.59 process, and was approved for implementation by the Facility Review Group (FRG), the onsite review authority.

Some of the Operations department management changes, in particular, affect the operating shift crews in that the position previously titled "shift supervisor" is now titled "shift manager" and the positions previously titled "line assistant shift supervisor" and "shift resource manager" are now both titled "operations supervisors." The intent of the change from "shift supervisor" to "shift manager" is to more properly reflect the actual level of responsibility given to the "shift manager" with respect to control and operation of the facility, and when compared to the level of control and responsibility that exists for other positions within the organization with the title "supervisor" versus the title "manager." Since the position previously called "shift supervisor," now titled "shift manager," is specifically addressed in TS Section 5.1.2 and referenced in TS Section 5.2.2.g, it was identified that an amendment to the facility operating license would be required.

By teleconference with the NRC Licensing Project Manager for CPS, followed by a teleconference with NRC Region III personnel on March 12, 1998, the NRC was advised of the proposed organizational changes prior to review and approval of the changes by the FRG. The NRC concurred with the proposed changes, including the management changes for the Operations organization, and agreed that the changes could be implemented prior to incorporating the required change to TS 5.1.2 provided a license amendment application was made as soon as possible (to incorporate the change in title from "shift supervisor" to "shift manager").

Description of Proposed Changes

In accordance with 10CFR50.90, Illinois Power (IP) proposes the following change to the CPS TS:

1. TS Section 5.1.2 is being changed to replace the position title of "shift supervisor" with "shift manager", and consequently the abbreviations of this title are being changed from "SS" to "SM."
2. TS Section 5.2.2.g is being changed to replace the reference to the position of "SS" with "SM" to be consistent with the changes being made to TS Section 5.1.2.

The proposed TS change is reflected on a marked-up copy of the affected pages contained in Attachment 3.

Justification for Proposed Changes

10CFR50.54, "Conditions of License," imposes requirements on licensees regarding personnel who operate or are responsible for operation of the licensee's facilities. 10CFR50.54(i) requires licensees to limit manipulation of controls at a facility to individuals who are licensed operators or senior operators. 10CFR50.54(j) requires that manipulation of apparatus or mechanisms which may affect reactivity be under the cognizance of individuals qualified as operators and senior operators in accordance with the requirements of 10CFR55. 10CFR50.54(k) requires that an operator or senior operator qualified pursuant to 10CFR55 be present at all times during operation of a facility. 10CFR50.54(l) requires that an individual who directs the activities of licensed operators be qualified as a senior reactor operator. Lastly, 10CFR50.54(m)(1) requires a senior operator licensed pursuant to 10CFR55 be present at the facility or readily available on call at all times during its operation, and shall be present at the facility during initial startup and approach to power, recovery from an unplanned or unscheduled shutdown or significant reduction in power, and refueling, or as otherwise prescribed in the facility license.

At CPS these requirements for a senior reactor operator qualified in accordance with 10CFR55 were fulfilled by the position titled "shift supervisor." CPS Technical Specification 5.1.2 specifically assigns the control room command function to the position of "shift supervisor" pursuant to the 10CFR50.54 requirements listed above for a senior operator. The intent of the proposed change to the Technical Specifications is to have the control room command function assigned to the position titled "shift manager," for which the 10CFR50.54 requirements for a senior operator would then apply.

Collectively, this proposed change involves changing the titles of "shift supervisor," "line assistant shift supervisor," and "shift resource manager" to that of "shift manager," "operations supervisor," and "operations supervisor" respectively (although only the first change requires changing the TS).

10CFR50.54(m)(2)(i) lists the minimum shift complement required during various plant operating modes. (USAR section 13.1.2.3 lists in tabular form the minimum shift complement for different operating modes and conditions.) At CPS the position of senior operator that was filled by the "shift supervisor" will now be titled "shift manager" as a result of the proposed change. As such, the proposed organizational change does not compromise the IP commitment to implement the shift makeup requirement of 10CFR50.54(m)(2)(i).

10CFR55.3 requires that a person who fulfills the function of senior operator be authorized by a license issued by the Commission. At CPS the individuals fulfilling the positions of "shift supervisor" held NRC senior operator licenses. This change will allow the position that was previously designated as "shift supervisors" and holding senior operator licenses, to be designated as "shift managers."

10CFR55.33 lists requirements for the issuance of a senior operator license. These requirements include an acceptable health and medical condition of the applicant, the successful completion of a written NRC administered examination, and successful completion of an NRC administered operational test. The NRC written examination and operational test requirements are in 10CFR55 parts 43 and 45 respectively. At CPS the 10CFR55 parts 33, 43, and 45 requirements were met by the individuals designated as "shift supervisors." These requirements will continue to be met by the "shift manager."

With certain clarifications and exceptions as identified in the USAR, IP is committed to comply with the requirements of Regulatory Guide 1.8, Proposed Revision 2 (February 1979), "Personnel Selection and Training." This regulatory guide describes a method acceptable to the NRC staff for complying with 10CFR50.34(b)(6)(i), which requires that applications for a license to operate a nuclear power plant include information concerning organizational structure, personnel qualifications, and related matters. The regulatory position is that the criteria for the selection and training of nuclear power plant personnel contained in ANSI/ANS 3.1-1978, "Selection and Training of Nuclear Power Plant Personnel," provide an adequate basis for the selection and training of nuclear power plant personnel as supplemented or modified by certain provisions given in this Regulatory Guide. CPS USAR section 13.1.2.3 provides a cross reference between titles of positions within the CPS organization to those of ANSI/ANS 3.1-1978. According to this cross reference the CPS title of "shift supervisor," prior to the management change, was equivalent to the ANSI/ANS title of "supervisor requiring NRC license." Subsequent to the management change, "shift manager" will be designated as equivalent to the ANSI/ANS title of "supervisor requiring NRC license."

CPS USAR section 13.1.2.3 also commits to a shift rotation of five or more operating crews. This proposed change will not impact the number of crews on rotation. The CPS operating crews each had a "shift supervisor" who performed the control room command function described in TS 5.1.2. The proposed change will maintain the five shift rotation of USAR 13.1.2.3 with a "shift manager" on each crew, and each "shift manager" will have the control room command function previously held by the position title of "shift supervisor."

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, or (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 are evaluated against each of these criteria below.

- 1) The proposed change replaces the title of "shift supervisor" with the title of "shift manager" as it pertains to the responsibilities of the position described in TS Section 5.1.2. The proposed change does not involve a change to the plant design or to the operation of the plant by qualified operators and senior operators. Although this change involves changes to the Operations department, individuals in those positions comprising the operating crews will continue to have to meet the same licensing, experience, training, and education requirements, notwithstanding the proposed change in the title of the individual with ultimate command authority in the main control room, from "shift supervisor" to "shift manager." Therefore, the operation of CPS is not affected by this change. Further, as also noted, the proposed change does not affect plant design. It therefore would not affect systems, structures, or components important to safety, particularly those associated with the plant accident analyses. As a result, the proposed change does not affect any parameters or conditions that may contribute to the initiation of any accidents previously evaluated, nor does it affect the operation or response of systems, structures, or components assumed to mitigate postulated accidents that have been evaluated/analyzed. On this basis, IP has concluded that the proposed change will not result in a significant increase in the probability or consequences of any accident previously evaluated.
- 2) As noted above, the proposed change does not involve a change to design or operation of the plant. As a result, the proposed change, which is only administrative in nature, cannot introduce any new failure modes or precursors, parameters, or conditions that could cause or contribute to the initiation of any new accidents not previously evaluated. On this basis, IP has concluded that the proposed change will not create the possibility of a new or different kind of accident not previously evaluated.
- 3) As noted above, the proposed change is an administrative change that involves no changes to plant design or operation, including the design or operation of systems, components, or structures important to safety. On this basis there are no margins of safety affected by the proposed change. As a result, IP has concluded that the proposed change will not result in a significant reduction in a margin of safety.

Based upon the foregoing, IP concludes that this proposed change does not involve a significant hazards consideration.