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ILLINOIS POWER COMPANY



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

June 12, 1989

10CFR50.90

Docket No. 50-461

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

Subject: Clinton Power Station
Proposed Amendment of Facility
Operating License No. NPF-62

Dear Sir:

Pursuant to 10CFR50.90, Illinois Power Company (IP) hereby applies for an amendment of Facility Operating License No. NPF-62 for Clinton Power Station (CPS). This request for amendment is being submitted in response to Generic Letter 88-16, "REMOVAL OF CYCLE-SPECIFIC PARAMETER LIMITS FROM TECHNICAL SPECIFICATIONS", the implementation of which, will result in a resource savings for IP and the NRC by eliminating the majority of license amendment requests due to changes in values of cycle-specific parameters in the Technical Specifications. IP requests NRC review and approval of this amendment so that the provisions of this amendment may be used at the onset to the second refueling outage at CPS. A description and justification including a Basis For No Significant Hazards Consideration for the proposed change is provided in Attachment 2. An affidavit supporting the facts set forth in this letter and Attachment 2 is provided in Attachment 1.

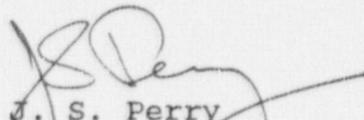
In accordance with the provisions of 10CFR170.12 and 170.21, IP is enclosing a check made out to the U.S. Nuclear Regulatory Commission in the amount of \$150 as payment of the application fee for this amendment.

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IP has reviewed this proposed Operating License change against the criteria of 10CFR51.22 for environmental considerations. The proposed change does not involve a significant hazards considerations, does not significantly increase the amounts or change the types of effluents that may be released offsite, nor does it significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, IP concludes that the proposed Operating License change meets the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.

Sincerely yours,



J. S. Perry
Assistant Vice President

GSL/krm

Attachments

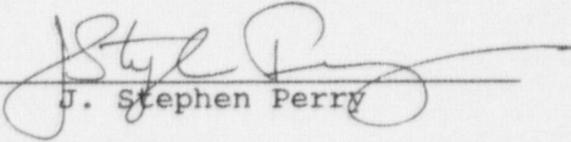
cc NRC Clinton Licensing Project Manager
NRC Resident Office
Regional Administrator, Region III, USNRC
Illinois Department of Nuclear Safety

STATE OF ILLINOIS
COUNTY OF DEWITT

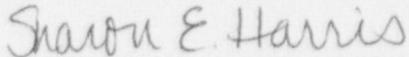
J. Stephen Perry, being first duly sworn, deposes and says:
That he is Assistant Vice President of Illinois Power
Company; that the provided information has been prepared
under his supervision and direction; that he knows the
contents thereof; and that to the best of his knowledge and
belief said request and the facts contained therein are true
and correct.

DATED: This 12 day of June 1989

Signed: _____


J. Stephen Perry

Subscribed and sworn to before me this 12 day of June
1989.



Notary Public

My Commission Expires:

March 9, 1991

"OFFICIAL SEAL"
Sharon E. Harris
Notary Public, State of Illinois
My Commission Expires 3/9/91

Purpose

Under the current Technical Specifications, a facility must have a license amendment processed to support each refueling (and the subsequent cycle of reactor operation) due to changes in cycle-specific parameters. The processing of these license amendments requires significant resource allocations for the NRC and Illinois Power (IP). Generic Letter (GL) 88-16, REMOVAL OF CYCLE-SPECIFIC PARAMETER LIMITS FROM TECHNICAL SPECIFICATIONS, proposes an alternative which eliminates the need to process a license amendment to support each refueling.

The alternative described in GL 88-16 involves removing cycle-specific parameter limits from the Technical Specifications. These cycle-specific limits will be maintained in a "CORE OPERATING LIMITS REPORT", and the Technical Specifications will be revised to reference this report. The Technical Specifications will also be revised to add administrative controls for the CORE OPERATING LIMITS REPORT. These administrative controls will require that the values in the report be established using NRC approved methodologies, and that copies of the report be supplied to the NRC after it is issued.

Generic Letter 88-16 Requirements

Generic Letter 88-16 lists three separate actions which are required to support removal of cycle-specific parameter limits from the Technical Specifications. Each action and the IP response to each action are provided as follows:

The first action requires the addition of the definition of a named formal report that includes the values of cycle-specific parameter limits that have been established using an NRC-approved methodology and that are consistent with all applicable limits of the safety analysis. IP proposes adding a definition to the Clinton Power Station-Technical Specification (CPS-TS) definition section for the CORE OPERATING LIMITS REPORT. The definition is based on the wording proposed in GL 88-16 and reads as follows:

CORE OPERATING LIMITS REPORT

1.9 The CORE OPERATING LIMITS REPORT is the Clinton-specific document that provides core operating limits for the current operating reload cycle. These cycle-specific core operating limits shall be determined for each reload cycle in accordance with Specification 6.9.1.9. Plant operation within these operating limits is addressed in individual Specifications.

The second action requires the addition of an administrative reporting requirement to submit the formal report on cycle-specific parameter limits to the NRC for information. IP proposes adding a new Technical Specification, CPS Technical Specification 6.9.1.9, to administratively control the CORE OPERATING LIMITS REPORT. This new Specification is consistent with the guidance contained in GL 88-16 and reads as follows:

CORE OPERATING LIMITS REPORT

6.9.1.9 Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT before each reload cycle or any remaining part of a reload cycle. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in General Electric Standard Application for Reactor Fuel (GESTAR), NEDE-24011-P-A-8, as amended and Maximum Extended Operating Domain and Feedwater Heater Out-of-Service Analysis for Clinton Power Station, NEDC-31546P, August 1988. The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as SHUTDOWN MARGIN, and transient and accident analysis limits) of the safety analysis are met. The CORE OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, to the NRC Document Control Desk with copies to the Regional Administrator and Resident Inspector within 30 days after the report (including revisions and supplements) is issued.

A copy of the CPS CORE OPERATING LIMITS REPORT for cycle 2 is included with this submittal.

The third action requires the modification of individual Technical Specifications to note that cycle-specific parameters shall be maintained within the limits provided in the defined formal report. IP has reviewed the Technical Specifications and proposes to modify all Technical Specifications (and Technical Specification Bases) which contain cycle-specific parameters so that instead of specific values, the Technical Specifications will refer to the defined formal report (CORE OPERATING LIMITS REPORT). The following section provides a summary of the Technical Specification changes proposed for this change package.

Summary Description of Specific Changes Proposed for the Clinton Technical Specifications

Specific changes to the CPS Technical Specifications are required to allow removal of cycle-specific parameter limits in accordance with the guidance contained in GL 88-16. Each change is summarized as follows:

<u>Tech Spec Section</u>	<u>Page</u>	<u>Description</u>
INDEX	1	Add CORE OPERATING LIMITS REPORT and renumber definitions 1.9 through 1.15.
INDEX	v	Delete Figures 3.2.1-1 through 3.2.1-7 and Figures 3.2.3-1 and 3.2.3-2.
INDEX	xxv	Add CORE OPERATING LIMITS REPORT.
1.9	1-2	Add a definition for CORE OPERATING LIMITS REPORT. (Definitions 1.9 through 1.14 will have to be renumbered to 1.10 through 1.15.)

<u>Tech Spec Section</u>	<u>Page</u>	<u>Description</u>
3.2.1	3/4 2-1	Replace reference to figures for the flow-dependent Maximum Average Planar Factor (MAPFAC), the power-dependent Maximum Average Planar Factor (MAPFAC _f) and the Maximum Average Planar Linear Heat Generation Rate (MAPLHGR) with references to the CORE OPERATING LIMITS REPORT.
Figures 3.2.1-1 through 3.2.1-7	3/4 2-2 through 3/4 2-4D	These figures will be deleted from the Technical Specifications and placed in the CORE OPERATING LIMITS REPORT.
3.2.3	3/4 2-7	Replace references to the flow-dependent MCPR (MCPR _f) and the power-dependent MCPR (MCPR) with references to the CORE OPERATING LIMITS REPORT.
Figures 3.2.3-1 and 3.2.3-2	3/4 2-8 and 3/4 2-9	These figures will be deleted from the Technical Specifications and placed in the CORE OPERATING LIMITS REPORT.
3.2.4	3/4 2-10	Replace the specific value for the Linear Heat Generation Rate (LHGR) with a reference to the CORE OPERATING LIMITS REPORT.
3.4.1.1	3/4 4-1	Remove cycle specific value for MCPR.
B 3/4.2.1	B 3/4 2-1 and B 3/4 2-2	Remove references to Figures 3.2.1-3 through 3.2.1-7 and add references to the CORE OPERATING LIMITS REPORT.
Table B 3.2.1-1	B 3/4 2-3	Remove specific value for LHGR and add references to the CORE OPERATING LIMITS REPORT.
B 3/4.2.3	B 3/4 2-4	Remove reference to Figures 3.2.3-1 and 3.2.3-2, and add references to the CORE OPERATING LIMITS REPORT.
B 3/4.4.1	B 3/4 4-1	Remove references to Specifications 3.2.1 and 3/4.2.3 and add references to the CORE OPERATING LIMITS REPORT.
6.9.1.9 (new)	6-21	Add this Specification to establish and administratively control the CORE OPERATING LIMITS REPORT.

Justification

The NRC's review of previous reload licensing submittals was limited to verification that the cycle-specific parameter limits were established using NRC-approved methodologies. The NRC indicated in the subject Generic Letter that NRC verification of the specific values of these limits is not practical. The proposed Technical Specification change will add new Specifications (T.S. 1.9 and 6.9.1.9) which will require the cycle-specific parameter limits to be determined using NRC-approved methodologies. Therefore, the cycle-specific parameter limits will continue to be established using NRC-approved methodologies.

In addition, the NRC uses the reload licensing submittals to trend the values used for the cycle-specific parameter limits. The addition of new Specifications (T.S. 1.9 and 6.9.1.9) will add a new requirement to the Technical Specifications which requires IP to submit a copy of the CORE OPERATING LIMITS REPORT to the NRC. This requirement will thus allow the NRC to continue trending of the cycle-specific parameter limits for CPS.

Removing the cycle-specific parameter limits from the Technical Specifications relieves the licensee of the requirement to submit a Technical Specification change request to support each refueling. It therefore also relieves the NRC of the requirement to process a license amendment for each plant refueling. This represents a significant savings in resources for both IP and the NRC with no reduction in the level of safety for CPS.

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.

- (1) The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. The core operating limits will continue to be established in the same manner as they currently are. The Technical Specifications will require the same limits to be adhered to and the same actions to be performed if any limit is approached or exceeded.
- (2) The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed change does not change the plant's physical configuration nor does it change the operation of any of the plant's systems or components.
- (3) The proposed change does not involve a significant reduction in a margin of safety. This proposed change does not involve a change to the values involved in the determination of any margin of safety. The proposed change only impacts the administrative control of the core operating limits.