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Docket No. 50-461

10CFR50.90

U.S. Nuclear Regulatory Commission
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**Subject: Correction of Information Provided in Previous Applications
for Amendments of the Clinton Power Station Operating License**

- References: (1) Letter U-601766 to the NRC, "Clinton Power Station Proposed Amendment of Facility Operating License No. NPF-62," dated December 17, 1990.
- (2) Letter U-601871 to the NRC, "Clinton Power Station Proposed Amendment of Facility Operating License No. NPF-62," dated September 20, 1991.
- (3) Letter U-602283 to the NRC, "Clinton Power Station Revision to Previously Submittal Proposed Amendment of Facility Operating License No. NPF-62," dated April 26, 1994.

Dear Madam or Sir:

This letter is provided to correct design information that was provided by Illinois Power (IP) in previously submitted license amendment requests concerning the Anticipated Transient Without Scram (ATWS) reactor recirculation pump trip (RPT) system for Clinton Power Station (CPS). The erroneous information that was provided supported proposed changes to the Technical Specifications (TS) for relaxation of Required Actions and Completion Times under the Limiting Condition for Operation (LCO) for the ATWS-RPT system, as well as for the additional allowed out of service time permitted for performance of required surveillances under the Surveillance Requirements section of the Technical Specification.

The associated amendment requests were submitted via the letters referenced above, the latter of which was a submittal for conversion to the Improved Technical Specifications. These requests were approved by the NRC respectively as Amendments 64, 71 and 95 to the CPS Operating License. Briefly, in each of these requests, IP erroneously described the trip system logic for the ATWS-RPT system as consisting of two redundant trip systems such that a trip in either system is capable of

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tripping both reactor recirculation pumps. Such an assumed configuration supported TS changes for longer instrument channel and trip system out-of-service times on the basis that, with an instrument channel(s) or trip system inoperable, the other trip system would still be capable of effecting a trip of both reactor recirculation pumps on demand.

In fact, however, the as-built design of the ATWS-RPT trip logic is such that each trip system trips only its respective (i.e., one) recirculation pump. This is consistent with the comparatively restrictive requirements originally specified in the CPS Technical Specifications, with the NRC's original evaluation of the system as documented in Supplement 6 to the Safety Evaluation Report for CPS (NUREG 0853), and in other correspondence that more clearly conveys the system design, as reviewed by IP in response to the discovered error. (It thus appears that the system design was correctly understood and assessed during the initial licensing of CPS, including development of the original Technical Specification for this system.)

This identified condition is currently being addressed under the CPS corrective action program. Although the ATWS-RPT system at CPS meets the requirements of 10 CFR 50.62 such that it remains capable of performing its intended function, IP is currently reviewing the system design with respect to such considerations as on-line testability. Upon completion of this evaluation, IP will implement final corrective actions, as appropriate, including proposed changes to the Technical Specifications. In the interim, and as supported by a safety evaluation performed pursuant to 10 CFR 50.59, IP is administratively imposing more conservative Technical Specification requirements equivalent to those specified in the original TS for the ATWS-RPT system.

Discovery of this erroneous information was evaluated for reportability pursuant to 10 CFR 50.9. IP has determined that the error does not have a significant implication for public health and safety or common defense and security. As noted above, the error only involves required Completion Times for restoring ATWS-RPT instrumentation or components to operable status if it is rendered or discovered to be inoperable. The error does not impact the requirement for the system to be operable during the applicable Modes of plant operation. The system continues to be capable of performing its required function, as its design meets the requirements of 10 CFR 50.62. Nevertheless, IP has submitted this letter to inform the NRC of this matter and of the actions taken and planned in response to the discovered error.

Sincerely Yours,



Michael A. Reandean
Director - Licensing

RWC/mlh

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