

June 15, 2007

Mr. Christopher M. Crane
President and Chief Nuclear Officer
AmerGen Energy Company, LLC
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: CLINTON POWER STATION, UNIT NO. 1 - COMMITMENT FOR HYDROGEN
IGNITER BACKUP POWER SUPPLY AND CLOSURE PROCESS FOR
GENERIC ISSUE 189, "SUSCEPTIBILITY OF ICE CONDENSER AND MARK III
CONTAINMENTS TO EARLY FAILURE FROM HYDROGEN COMBUSTION
DURING A SEVERE ACCIDENT"

Dear Mr. Crane:

This letter acknowledges your February 28, 2007, letter committing to changes at the Clinton Power Station, Unit No. 1 (Clinton), that will enhance plant capabilities to mitigate the potential for early containment failure from hydrogen combustion. In addition to existing procedures to power the hydrogen igniters from alternate power supplies, you described changes involving procurement of portable equipment to power one train of igniters using a portable generator and through a cross-tie from the Division 3 electrical distribution system, and development of associated procedures and training.

The Nuclear Regulatory Commission (NRC) staff agrees that the proposed enhancements will resolve concerns related to Generic Issue 189 (GI-189), "Susceptibility of Ice Condenser and Mark III Containments to Early Failure from Hydrogen Combustion During a Severe Accident," and provide benefits for certain security scenarios. The NRC staff understands that the changes will enhance the electrical independence of the containment hydrogen igniter system. This action is warranted for boiling water reactors with Mark III containments because many systems that prevent core damage rely on the same power supplies and electrical distribution system as the hydrogen igniters. This enhancement mitigates the potential for early containment failure by allowing control of hydrogen within containment following certain beyond-design-basis events that may progress to core damage and preclude operation of the hydrogen igniters from their normal power supply. The NRC staff expects this enhancement will provide hydrogen igniter system electrical independence commensurate with the expected frequency, challenges, and uncertainties associated with these beyond-design-basis events.

Consistent with the guidelines of NRC Management Directive 6.4, "Generic Issues Program," the NRC staff will perform a verification inspection at Clinton. These inspections will include elements to verify that you establish procedures to provide backup power to the hydrogen igniters, train appropriate staff in the procedures, and institute appropriate controls on the reliability and availability of necessary equipment. Procedures that allow trained personnel to establish backup power to the igniters within 3 hours are fully consistent with goals to mitigate

potential hydrogen accumulation. Implementation of vendor recommended maintenance for portable equipment and existing procedures for maintenance of installed equipment will ensure adequate availability and reliability of the backup power supplies. In addition, NRC licensing project managers may verify the integrity of your commitments over time through established review procedures for your commitment management program.

Verification of your committed actions and those of other affected licensees will provide the basis by which the NRC will close out GI-189. The NRC staff will perform the verification inspection at a time consistent with the implementation date specified in your letter. Accordingly, please keep the NRC staff informed of any changes in the scope of modifications or the implementation date.

Sincerely,

/RA/

Catherine Haney, Director
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-461
License No. NPF-62

cc: See next page

potential hydrogen accumulation. Implementation of vendor recommended maintenance for portable equipment and existing procedures for maintenance of installed equipment will ensure adequate availability and reliability of the backup power supplies. In addition, NRC licensing project managers may verify the integrity of your commitments over time through established review procedures for your commitment management program.

Verification of your committed actions and those of other affected licensees will provide the basis by which the NRC will close out GI-189. The NRC staff will perform the verification inspection at a time consistent with the implementation date specified in your letter. Accordingly, please keep the NRC staff informed of any changes in the scope of modifications or the implementation date.

Sincerely,

/RA/

Catherine Haney, Director
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-461
License Nos. NPF-62

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Clinton Power Station, Unit No. 1

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