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**ILLINOIS
POWER**

JGC-003-94
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U-602254
L47-94(04-18)LP
8E.100c

Docket No. 50-461

10CFR50.90

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

Subject: Clinton Power Station Proposed Amendment of Facility
Operating License No. NPF-62: Revision to Technical Specifications
3/4.1.3.1, 3/4.1.3.2, and 3/4.10.2 (RS-92-011)

Dear Sir:

Pursuant to 10CFR50.90, Illinois Power (IP) hereby applies for amendment of Facility Operating License No. NPF-62, Appendix A - Technical Specifications, for Clinton Power Station (CPS). The Technical Specification changes proposed in this application are being submitted as a follow-up to IP letter U-602115 (dated April 16, 1993) and corresponding License Amendment 81 (issued July 15, 1993), which involved the reorganization and renumbering of a particular surveillance requirement. The proposed changes requested herein are required to correct overlooked references to the renumbered Surveillance Requirement, which were not previously identified and which are contained in the following Technical Specifications: 3/4.1.3.1, "Control Rod Operability," 3/4.1.3.2, "Control Rod Maximum Scram," and 3/4.10.2, "Rod Pattern Control System." The requested changes are strictly editorial in nature and involve no changes to the current text or intent of these specifications.

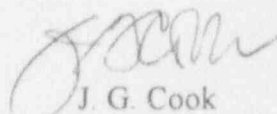
A description of the proposed changes and the associated justification (including the Basis For No Significant Hazards Consideration) are provided in Attachment 2. Marked-up copies of the affected pages from the current Technical Specifications are provided in Attachment 3. In addition, an affidavit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

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ADD 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 type of effluents that may be released off-site, nor do they significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, IP concludes 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,



J. G. Cook
Vice President

CLJE/csm

Attachments

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

STATE OF ILLINOIS
COUNTY OF DEWITT

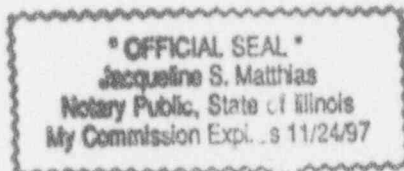
J. G. Cook, being first duly sworn, deposes and says: That he is Vice President of Illinois Power Company; that the application for amendment of Facility Operating License NPF-62 has been prepared under his supervision and direction; that he knows the contents thereof, and that to the best of his knowledge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

DATE: This 18 day of April, 1994.

Signed: _____

J. G. Cook

Subscribed and sworn to before me this 18 day of April, 1994.



Notary Public

Background/Justification for Proposed Changes

By letter U-602115 (dated April 16, 1993), IP requested several changes to the CPS Technical Specifications to provide more flexibility in performing testing required during plant startup. These proposed changes were approved by the NRC and incorporated via License Amendment 81 (NRC letter dated July 15, 1993). Included in the approved changes is a change to the Surveillance Requirement(s) for performing scram insertion time testing of control rods (on which maintenance or modifications were performed during an outage) which will allow such testing to be done at low reactor pressure prior to reactor startup. This change did not eliminate the requirement to perform scram-time testing of all control rods prior to exceeding 40% power, but it does potentially provide relief to plant operators by not requiring such testing to be done during a particularly active and stressful period during plant startup when other important evolutions and required testing are being performed.

Prior to the above change, all control rod scram-time testing requirements were specified within Surveillance Requirement 4.1.3.2 (parts "a", "b" and "c"). Implementation of the above-described change necessitated reorganizing Specification 4.1.3.2 and splitting it into Specifications 4.1.3.2.1 (parts "a" and "b") and 4.1.3.2.2 as reflected in Amendment 81 (NRC letter dated July 15, 1993). Specifically, former Specification 4.1.3.2.b was rewritten (to include the low-pressure testing option described above) and renumbered to become Specification 4.1.3.2.2. Consequently, former Specifications 4.1.3.2.a and 4.1.3.2.c were renumbered to become Specifications 4.1.3.2.1.a and 4.1.3.2.1.b, respectively.

Subsequent to receipt of Amendment 81, it was recognized that some references to Specification 4.1.3.2 elsewhere in the Technical Specifications had been overlooked. That is, the need to update these Technical Specifications with the renumbered Surveillance Requirement(s) was not identified. Due to this oversight, IP herein submits follow-up changes to correct the surveillance number references identified in the Technical Specifications.

Description of Proposed Changes

In accordance with 10CFR50.90, the following changes are being proposed:

- (1) TS 3/4.1.3.1, "Control Rod Operability," is being revised to correctly refer to the surveillance numbers reflected in Amendment 81 by replacing "4.1.3.2" in Surveillance Requirement 4.1.3.1.3 with "4.1.3.2.1" and "4.1.3.2.2."
- (2) TS 3/4.1.3.2, "Control Rod Maximum Scram Insertion Times," is being revised to correctly refer to the surveillance numbers reflected in Amendment 81 by replacing "4.1.3.2 a or b" in Action "a" with "4.1.3.2.1.a or 4.1.3.2.2," replacing "4.1.3.2 c" in Actions "b" and "c" with "4.1.3.2.1.b," and replacing "4.1.3.2.a and b" in Action "c" with "4.1.3.2.1.a and 4.1.3.2.2."

- (3) TS 3/4.10.2, "Rod Pattern Control System," is also being revised to correctly refer to the surveillance numbers reflected in Amendment 81 by replacing "4.1.3.2" within part "b" of the Limiting Condition for Operation with "4.1.3.2.1 and 4.1.3.2.2."

The proposed changes are reflected on the marked-up copies of pages from the CPS Technical Specifications contained in Attachment 3.

Basis for No Significant Hazards Consideration

In accordance with 10CFR50.92, a proposed change to the Operating 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 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 are collectively evaluated against these criteria as follows.

The changes proposed herein are only editorial in nature. They merely correct the noted surveillance number references to be consistent with Amendment 81 without making any changes to the text or intent of the affected Surveillance Requirements.

- (1) These changes do not affect the intent or implementation of the applicable Technical Specifications. The changes simply make the affected Technical Specifications consistent. Since these are only editorial changes which do not impact the plant design or operations, they cannot increase the probability or the consequences of any accident previously evaluated.
- (2) The proposed changes are editorial only and do not affect the plant design or operation. No new failure modes are introduced by such changes and, therefore, the request will not create the possibility of a new or different kind of accident from any accident previously evaluated.
- (3) The proposed changes merely correct an editorial oversight. These changes do not alter or delete any technical requirements, and therefore do not involve a reduction in a margin of safety.

Based upon the foregoing, IP concludes that these changes do not involve a significant hazards consideration.