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ILLINOIS POWER COMPANY



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

JSP-0318-90
April 25, 1990
10CFR50.90

Docket No. 50-461

Nuclear Regulatory Commission
Document Control Desk
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 amendment of Facility Operating License No. NPF-62, Appendix A Technical Specifications, for Clinton Power Station (CPS). This request consists of proposed changes to Technical Specification 3/4.7.4, "Snubbers," and Technical Specification 3/4.9.6.1, "Refueling Platform". For each of these proposed Technical Specification changes, a description, the associated justification (including a Basis For No Significant Hazards Consideration), and marked-up copies of pages from the current Technical Specifications are provided in Attachment 2. In addition, an affidavit supporting the facts set forth in this letter and its attachments is provided in Attachment 1.

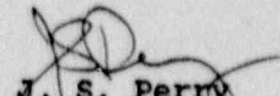
IP has reviewed the proposed changes against the criteria of 10CFR51.22 for categorical exclusion from environmental impact considerations. The proposed changes do not involve a significant hazards consideration, or significantly increase the amounts or change the types of effluents that may be released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

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Please note that these proposed changes are required for the second refueling outage which is currently scheduled to begin September 9, 1990. Therefore, your prompt attention to this application is appreciated.

Sincerely yours,


J. S. Perry
Vice President

DAS/krm

Attachments

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

STATE OF ILLINOIS
COUNTY OF DEWITT

J. Stephen Perry, 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.

DATED: This 25 day of April 1990

Signed: _____

J. Stephen Perry
J. Stephen Perry

Subscribed and sworn to before me this 25th day of
April 1990.

Linda S. French

Notary Public



Attachment 2

The following packages comprise Attachment 2.

NS-89-015
NS-89-018

Description of Proposed Changes

In accordance with 10CFR50.90, the following change to Technical Specification 3/4.7.4, "Snubbers," is being proposed:

The subsequent additional sample size for functional testing per Surveillance Requirement 4.7.4.e, Sample Plan 1, is being proposed to be changed from 10% to 5%. This change is being proposed to provide an equal basis for all three sample plans of Surveillance Requirement 4.7.4.e.

Justification for Proposed Changes

As stated in the Bases for this Technical Specification, snubbers are required to be operable to ensure that the structural integrity of the reactor coolant system and all other safety-related systems is maintained during and following a seismic or other event initiating dynamic loads.

Surveillance Requirements 4.7.4.e, f, g and h provide requirements for functional testing of snubbers. The specified functional testing sample plans require a random sample of each type of snubber to be functionally tested during each reactor shutdown. If failures are experienced, additional samples must be functionally tested. This proposed change would revise the subsequent additional sample size for functional testing required by Surveillance Requirement 4.7.4.e, Sample Plan 1, from 10% to 5%. The basis for this proposed change is presented below.

Surveillance Requirement 4.7.4.e permits the use of any one of three specified sample plans for functional testing of snubbers. Essentially, all three sample plans require the testing of an initial random sample of snubbers from the total population. For every inoperable snubber identified during testing of the initial sample, a subsequent additional sample is required to be functionally tested. For Sample Plan 1, the size of the initial and the subsequent additional samples is currently 10% and 10%, respectively. The initial sample size of 10% was selected on the basis that every snubber in the plant would be tested at least once every 15 years when the associated functional testing frequency is 18 months. The subsequent additional sample size of 10% was selected as a conservative value.

For Sample Plans 2 and 3, initial and subsequent additional sample sizes are both determined by statistical considerations, and the additional sample sizes are half that of the initial sample size. All three sample plans should yield the same results. Yet for a population that would produce the same initial sample size for Sample Plans 1 and 2 or for Sample Plans 1 and 3, the subsequent additional sample sizes will differ by twice as much. To provide an equal basis for all three sample plans, the conservatively determined subsequent additional sample size of 10% for Sample Plan 1 should be reduced to 5%.

The ASME Operation and Maintenance Committee (OM-4) Standard, "Examination and Performance Testing of Nuclear Power Plant Dynamic Restraints (Snubbers)," has taken this into consideration and changed the recommended subsequent additional sample size for Sample Plan 1 from 10% to 5%. This standard has been incorporated into the 1989 Edition of the ASME Boiler & Pressure Vessel

Code, Section XI, for plant surveillance guidance and is currently under review by the NRC for incorporation into 10CFR50. Additionally, this proposed change was recently approved on the Grand Gulf docket.

Further, in accordance with Surveillance Requirement 4.7.4.g, an engineering evaluation must be made of each functional test failure to determine the cause of the failure. The results of this evaluation must be used, as applicable, in selecting additional snubbers to be tested. Additionally, if any snubber fails to lock up or fails to move (i.e., frozen-in-place) during functional testing, the cause must be evaluated. If it is determined that the cause of failure is manufacturer or design deficiency, all snubbers of the same type that are subject to the defect must be functionally tested. This testing must be performed independently of the additional sampling requirements of Surveillance Requirement 4.7.4.e. Therefore, functional test failures caused by failure to lock up or move as a result of manufacturer defect or design deficiency will result in additional functional testing, irrespective of the subsequent additional sample size.

Basis For No Significant Hazards Consideration

In accordance with 10CFR50.92, a proposed change to the license (Technical Specifications) involves no significant hazards considerations 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 to the subsequent additional functional test sample size for Surveillance Requirement 4.7.4.e, Sample Plan 1, provides an equal basis for all three specified sample plans. This proposed change is consistent with the ASME OM-4 Standard which has been incorporated into the 1989 Edition of the ASME Code, Section XI. Additionally, if a failure to lock up or move is determined to be caused by manufacturer or design deficiency, functional testing of all snubbers of the same type that may be subject to the same defect will continue to be required by Surveillance Requirement 4.7.4.g, irrespective of the subsequent additional sample size. Therefore, these proposed changes will not significantly increase the probability or the consequences of any accident previously evaluated.
- (2) These proposed changes do not result in any change to the plant or its operation. The scope of snubbers to be functionally tested per these surveillance requirements has not been reduced. Therefore, these proposed changes cannot create the possibility of a new or different kind of accident than previously evaluated.
- (3) The proposed change to the subsequent additional functional test sample size for Surveillance Requirement 4.7.4.e, Sample Plan 1, provides an equal basis for all three specified sample plans. This proposed change is consistent with the ASME OM-4 Standard which has been incorporated into the 1989 Edition of the ASME Code, Section XI. Additionally, if a

failure to lock up or move is determined to be caused by manufacturer or design deficiency, functional testing of all snubbers of the same type that may be subject to the same defect will continue to be required by Surveillance Requirement 4.7.4.g, irrespective of the subsequent additional sample size. Therefore, this proposed change will not result in a significant reduction in the margin of safety.

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