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February 23, 1993

10CFR50.55a(g)(5)

Docket No. 50-461

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

Subject: Clinton Power Station
Submittal of Revision 14 to
the Inservice Testing Program

Dear Sir:

Illinois Power hereby submits Revision 14 to the Clinton Power Station (CPS) Inservice Testing (IST) Program for the initial 120-month inspection interval. Revision 14 (attached) is being submitted primarily to revise Relief Request No. 4001. This relief request has been revised to delete its application to a number of open-ended piping lines associated with the diesel generator systems at CPS since these lines have been reclassified to no longer be within the scope of the ASME Code. Since these lines have been reclassified, relief from the requirements of IWC-1220, IWC-2500 and Table IWC-2500-1 is no longer required for these lines. Since the scope of this relief request revision is limited to the deletion of certain components from the applicability of the relief request and it does not involve any additional relief from that previously granted, no further NRC review of Relief Request No. 4001 Revision 2 is required.

In addition, Revision 14 to the IST Program provides improved reference drawings for several of the relief requests. These improved drawings do not involve any technical changes to the associated relief requests. As a result, no further NRC review of these improved drawings or their associated relief requests is required.

It should be noted that IP's submittal of Revision 13 to the CPS IST Program (reference IP letter U-602069 dated December 23, 1992) contained two changes to the IST Program (one revised relief request and one new relief request) which required (and still require) further NRC review. Those changes were provided in Attachment 2 to that letter and are reflected in the attachment to this letter as well. The first of these changes (Relief Request No. 2014 Revision 3) involves the deletion of IP's commitment to perform partial-stroke exercise testing of the emergency core cooling system testable check valves during cold shutdowns. (IP will continue to full-stroke exercise these valves during refueling outages.) The second change (Relief Request No. 2035 Revision 0) involves relief from the IWC-3512 requirement that the person supervising safety and relief valve testing hold a degree in a branch of Engineering from a recognized School of Engineering and have at least two

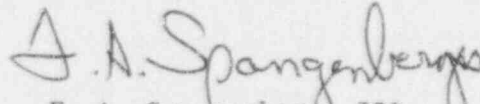
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years practical experience in fluid flow measurement. IP has proposed that these personnel be qualified in accordance with the Quality Assurance Manual for CPS. This approach is consistent with OM-1 which is referenced by the 1989 edition of ASME Section XI incorporated in 10CFR50.55a.

As noted previously, the attachment to this letter contains Revision 14 (Appendix III) of the IST Program for CPS. The revised Appendix III reflects the above-described revision to Relief Request No. 4001 and the two changes requiring further NRC review which were previously provided in IP's December 23, 1992 submittal. Because IP plans to implement Relief Request No. 2035 during the fourth refueling outage at CPS (which is currently scheduled to begin on September 26, 1993), IP requests that the two changes requiring further NRC review be reviewed on a schedule sufficient to support this outage.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "F. A. Spangenberg, III". The signature is fluid and cursive, with the last name "Spangenberg" being the most prominent part.

F. A. Spangenberg, III
Manager, Licensing and Safety

DAS/mfm

Attachment

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