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March 29, 1993

10CFR50.36

Docket No. 50-461

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

Subject: Clinton Power Station  
Technical Specification Bases

Dear Sir:

The purpose of this letter is to request changes to Illinois Power Company's Clinton Power Station (CPS) Technical Specification Bases. The Bases contained in the Clinton Power Station Technical Specifications summarize the reasons for the Specifications in Sections 2.0, 3.0 and 4.0, but in accordance with 10CFR50.36, are not part of the Technical Specifications. Therefore, these Bases changes are not being submitted as an application for amendment of Operating License NPF-62 since the requirements of 10CFR50.90 are not applicable to such changes.

The proposed changes provide additional guidance on the need to obtain samples for isotopic analysis following temporary increases observed in the levels indicated by the offgas pre-treatment radiation monitor following certain testing, maintenance or operational evolutions. Specifically, the Bases for Technical Specifications 3/4.4.5 and 3/4.7.8.2 are being revised to indicate that based on the fact that experience has shown that certain planned evolutions yield a predictable, characteristic response by the offgas pre-treatment process radiation monitor in which there is no actual change in the steady-state operating characteristics of the reactor fuel relative to potential or actual fission gas release, compliance with the noted Technical Specifications does not require reactor coolant or offgas samples to be taken in these cases. These planned evolutions include placing a condensate polisher in service, temporarily turning the offgas pre-treatment monitor sample pump off, swapping steam jet air ejectors and regenerating the offgas desiccant dryer(s). In addition, the Bases were revised

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to require verification that the offgas pre-treatment process radiation monitor readings return to expected levels following the identified evolutions. This should confirm that there was no actual change in offgas radiation levels and should obviate the need for any samples to be taken and isotopically analyzed. As a result, this proposed change cannot increase the probability or the consequences of any accident previously evaluated, create the possibility of a new or different accident, or result in a reduction in the margin of safety.

The proposed changes were discussed with the NRC Project Manager for CPS and appropriate personnel from Region III and NRR by telephone on January 4 and 15, 1993.

A marked-up copy of the affected Bases pages is provided in Attachment 1. It should be noted that IP previously proposed changes to the Bases for Technical Specification 3/4.4.5 in a letter (U-601650) dated June 19, 1990. Issuance of Bases pages reflecting those requested changes is still pending. For your information, the attached Technical Specification Bases pages include the changes originally requested in the above referenced letter.

Sincerely yours,



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

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Attachment

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