



Illinois Power Company
Clinton Power Station
P.O. Box 678
Clinton, IL 61727
Tel 217 935-8881

U-602192
L47-93(1210)LP
8E.100c

December 10, 1993

Docket No. 50-461

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

Subject: Clinton Power Station Proposed Changes to 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. One of the proposed changes revises the value of a particular parameter that was re-evaluated as a result of a recently completed analysis to support relaxation of the required tolerance for the safety-mode lift setpoint for the safety/relief valves (SRVs). The remaining two changes are associated with previously submitted proposed changes to Technical Specifications 3.3.2, "Instrumentation-Containment and Reactor Vessel Isolation Control System," and 3.6.5, "Drywell Post-LOCA Vacuum Relief Valves."

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, the proposed Bases changes submitted via this letter 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.

Each Bases change is discussed in detail in its own attachment to this letter. Marked-up/revised Bases pages reflecting the proposed changes are also included in each respective attachment.

Sincerely yours,

Richard F. Phares
Director-Licensing

TBE/nls

Attachment

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

9312150349 931209
PDR ADOCK 05000461
P PDR

Ad
111

Proposed Bases Changes for Technical Specification 3.3.2

By letter U-602070 dated December 15, 1992 Illinois Power (IP) submitted proposed changes to Clinton Power Station (CPS) Technical Specification 3.3.2, "Instrumentation-Containment and Reactor Vessel Isolation Control System". Subsequent to that submittal, and based on discussions with NRC staff personnel involved in the review and approval of the proposed Technical Specification changes, it was determined that IP should submit proposed changes to the associated Bases. Bases changes are hereby requested as further discussed below.

The changes proposed for CPS Technical Specification 3.3.2 were requested primarily to permit a longer out-of-service time for an inoperable leak detection differential temperature instrument channel(s) when a sufficient number of associated ambient temperature instrument channels are operable. As noted in IP's December 15, 1992 submittal, the proposed changes to the associated Technical Specification Action Statement(s) would permit a loss of diversity for mitigating the effects of a steam leak in the associated area(s) for up to 24 hours. However, this loss of diversity [i.e., having a differential temperature instrument channel(s) inoperable] would be permitted only if a sufficient number of ambient temperature instrument channels are operable. No loss of function would therefore be permitted, thus ensuring that an automatic isolation in response to a steam leak is still capable of occurring.

Discussions with NRC staff personnel have determined that it would be appropriate for IP to propose a change to the corresponding BASES for Technical Specification 3.3.2 addressing the extended allowed out-of-service time for the differential temperature instrumentation. Under the proposed change, the Bases would note the extended time is permitted on the basis that no loss of function exists during the time that the differential temperature instrument channel(s) is (are) inoperable. Accordingly, proposed changes to the Bases for Technical Specification 3.3.2 are proposed as indicated on the following pages (pages 2 and 3 of this attachment). The additional text should be inserted as shown.

Note

It should be noted that the proposed Technical Specification changes described above (submitted via IP letter U-602070 identified above) were recently approved by the NRC and issued via Amendment No. 85 to the CPS Operating License. Although the NRC letter and Safety Evaluation accompanying the amendment did not discuss proposed changes to the Bases associated with Technical Specification 3.3.2, IP is submitting proposed changes to the Bases (as described above) notwithstanding