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Docket No. 50-461

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Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Clinton Power Station Response to NRC Request for
Additional Information Dated December 28, 1994

Dear Sir:

This letter is being provided in response to the NRC's request dated December 28, 1994. During the NRC staff's review of Illinois Power's (IP's) request to implement the improved Standard Technical Specifications (ITS), the NRC staff identified a potential concern regarding the requirements for inoperable Emergency Core Cooling System (ECCS) actuation instrumentation during plant shutdown conditions. Specifically, the NRC staff was concerned that several channels of ECCS actuation instrumentation could be inoperable, resulting in a loss of automatic initiation capability, for up to 24 hours during which time operations with a potential for draining the reactor vessel (OPDRVs) could be conducted. The Required Actions of Limiting Condition for Operation (LCO) 3.3.5.1, "ECCS Instrumentation," require the associated supported feature(s) to be declared inoperable within one hour if automatic initiation capability does not exist for both divisions of ECCS. However, these Required Actions contain a Note which restricts applicability of this requirement to MODES 1, 2, and 3.

Prior to approval of IP's request to implement the ITS, the NRC staff discussed this concern with IP personnel. At that time, IP confirmed that Technical Specification (TS) 5.5.10, "Safety Function Determination Program," which implements the requirements of LCO 3.0.6, would ensure that when a supported system LCO (LCO 3.5.2 in this case) is not met solely due to a support system LCO not being met, additional evaluations and limitations may be required, such that a loss of safety function is identified and that appropriate actions are taken. (LCO 3.5.2 would require immediate suspension of OPDRVs and restoration of automatic ECCS capability within 4 hours.)

The NRC's December 28, 1994 letter stated that the NRC staff was reconsidering the practicality of restricting the requirement to declare the supported feature(s) inoperable within one hour to those times in which the plant is operating in MODES 1, 2, and 3. In addition, the December 28, 1994 letter requested IP to confirm in writing that IP understands and agrees with the explanation of the applicability of the new TS.

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IP hereby confirms its understanding of the ITS and agrees with the explanation provided in the NRC's December 28, 1994 letter with the following clarification. The Safety Function Determination Program required by TS 5.5.10 will ensure that when a supported system LCO is not met solely due to a support system LCO not being met, additional evaluations and limitations may be required, such that a loss of safety function is identified and that appropriate actions are taken. The ACTIONS provided in the ITS for instrumentation were originally and intentionally structured to provide "the appropriate actions" for a loss of automatic initiation capability as identified in TS 5.5.10 and LCO 3.0.6. Thus, while operating in MODES 1, 2, and 3, the Required Actions of LCO 3.3.5.1 provide the appropriate actions for a loss of automatic initiation capability (including the allowance of one hour to correct the loss of function situation prior to cascading to the supported system LCOs). However, in MODES 4 and 5, the Required Actions of LCO 3.3.5.1 do not provide "the appropriate actions." Therefore it is IP's position that during MODES 4 and 5, the supported system LCOs must be entered prior to expiration of the associated 24-hour Completion Time. IP will take appropriate, timely action in response to such a total loss of automatic ECCS initiation capability.

IP understands that the Industry (through the Nuclear Energy Institute (NEI)) and the NRC are evaluating changes to the ITS to resolve this concern. IP will monitor the progress of these efforts and, following resolution, submit any appropriate changes to the CPS Technical Specifications for NRC review.

Sincerely yours,



Richard F. Phares
Director, Licensing

DAS/csm

cc: NRC Clinton Licensing Project Manager
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