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John G. Cook
Vice President

U-602372
L47-94(11-18)LP
8E.100a
JGC-372-94
November 18, 1994
10CFR50.90

Docket No. 50-461

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Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Clinton Power Station Final Revision to Previously Submitted
Proposed Amendment of Facility Operating License No. NPF-62
(References: IP Letters U-602196 dated October 26, 1993; U-602283
dated April 26, 1994; and U-602364 dated October 31, 1994)

Dear Sir:

By letter dated October 26, 1993 (reference letter U-602196), Illinois Power (IP) applied for amendment of Facility Operating License No. NPF-62, Appendix A - Technical Specifications, for Clinton Power Station (CPS) to request a complete revision of the CPS Technical Specifications for conversion to the Improved Technical Specifications (ITS) per the guidance provided by NUREG-1434, "Improved BWR-6 Technical Specifications," Revision 0, dated September 1992. As a result of additional guidance provided by the NRC staff for improving the scope and content of the Administrative Controls section of the Technical Specifications, and as a result of resolving comments, issues and open items identified during the course of the staff's review of IP's ITS submittal (along with the other BWR-6 submittals) additional proposed changes were submitted to the NRC staff by followup IP letters U-602283 dated April 26, 1994 and U-602364 dated October 31, 1994.

IP is now completing the training and procedure changes required for implementation of the ITS, including final development of the Operational Requirements Manual that contains most of the requirements being relocated from the current Technical Specifications in accordance with the ITS. These activities have resulted in a thorough and final review of IP's ITS submittal, and as a result, several minor but necessary changes have been identified. IP therefore proposes to incorporate these identified changes into the CPS ITS submittal.


The proposed changes are reflected in Enclosures 2 and 3 to this letter and are supported by Enclosure 1 to this letter. Enclosure 1 is an affidavit supporting the facts and statements addressed or contained in this letter and its enclosures. Enclosure 2 relates to Enclosure 2 of IP's initial (October 26, 1993) submittal in which IP provided markups of the current CPS Technical Specifications (including justifications and No Significant Hazards Consideration evaluations for each of the changes from the current CPS

Technical Specifications) and markups of the associated NUREG-1434 Technical Specifications (including justifications for deviations). Similar to what was previously provided in followup letters U-602283 and U-602364 (which effectively modified IP's initial submittal), Enclosure 2 to this letter provides replacement pages for the corresponding pages provided in Enclosure 2 of IP's initial submittal (or in the corresponding enclosures of IP's followup letters). Enclosure 3 provides unmarked, final, typed pages for the CPS ITS reflecting the incorporation of the changes proposed by this letter. ["Final" typed pages for the entire CPS ITS submittal were provided in Enclosure 5 of IP's October 31, 1994 letter (U-602364). Due to the changes proposed in this letter, the pages provided in Enclosure 3 supersede the corresponding pages provided in Enclosure 5 of the October 31, 1994 letter.] Enclosure 3 also contains an ITS page for which a correction was made relative to the corresponding page provided in IP's October 31, 1994 letter. Following submittal of that letter, IP personnel identified that the typed ITS page 3.6-10 provided in Enclosure 5 was not consistent with the corresponding marked-up page provided in Enclosure 4 of that letter. That inconsistency is being corrected by providing a new final, typed page in Enclosure 3 of this letter (page 1 of 6 of Enclosure 3).

The proposed changes reflected in Enclosures 2 and 3 are requested to ensure that the ITS text correctly reflects the intent of the affected ITS requirements. These changes do not change any previous determinations or discussion provided for the Technical Specification changes addressed in the previous letters comprising IP's ITS submittal. Therefore, IP's previous conclusions, i.e., that the affected changes involve no significant hazards consideration and that they meet the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement, remain unchanged.

The proposed changes have been discussed with Mssrs. Schulten and Pickett of the NRC staff. In addition, the proposed changes have been reviewed by the CPS Facility Review Group.

Sincerely yours,


J. G. Cook
Vice President

TBE/csm

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

Enclosure 1
to U-602372

STATE OF ILLINOIS
COUNTY OF DEWITT

John G. Cook, 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 letter and the facts contained therein are true and correct.

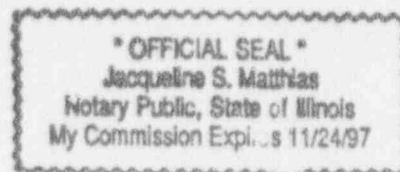
Date: This 18 day of November 1994.

Signed: _____

STATE OF ILLINOIS

} SS.

Dewitt COUNTY



Subscribed and sworn to before me this 18th day of November 1994.

Jacqueline S. Matthias
(Notary Public)