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U-602410
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Docket No. 50-461

10CFR50.90

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Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Clinton Power Station Proposed Amendment of
Facility Operating License No. NPF-62 [LS-94-006]
(Reference: Illinois Power Letters U-602320, dated
August 12, 1994, and U-602355, dated October 14, 1995)

Dear Sir:

By letter dated August 12, 1994 Illinois Power (IP) submitted an application for amendment of the Clinton Power Station (CPS) Operating License (License No. NPF-62) to incorporate a proposed change to the CPS Technical Specifications (Appendix A). IP proposed to revise Technical Specification 3/4.6.2.2, "Drywell Bypass Leakage," to allow drywell bypass leakage tests (DBLRTs) to be performed at intervals of up to ten years based, in part, on the demonstrated performance of the drywell barrier with respect to leak tightness. In consideration of the fact that there is a large margin between the drywell bypass leakage design limit and the Technical Specification limit (10% of the design limit), IP's request was based on the fact that a very large additional margin has been proven to exist between measured drywell bypass leakages to date and the Technical Specification limit. Testing performed to date has shown that there has been no significant reduction in this margin, that testing at the current interval of 18 months is unnecessary and excessive and that the test interval may therefore be extended. IP indicated in its submittal that the requested change was being submitted as part of the cost beneficial licensing action (CBLA) program established by the NRC, with the understanding that increased priority would be given to such submittals. IP noted that expeditious review was also desired to support implementation of an approved license amendment in time for the fifth refueling outage (RF-5) at CPS scheduled to begin March 12, 1995.

Following IP's August 12, 1994 submittal, verbal discussions with the NRC staff in late September (1994) indicated that a technical review of IP's submittal was underway and that IP's request appeared to be acceptable except for the proposed length (ten years) of the increased test interval. The NRC's staff's position, as it was made known to IP, was that a five-year interval would be acceptable. In response to this expressed position, IP submitted letter U-602355 dated October 14, 1994 to revise its August 12 application by accordingly changing the proposed test frequency for the drywell bypass leakage test to at least once per five years.

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More recently, IP was unexpectedly informed that its application for amendment (as revised), as well as a similar application made by Entergy Operations, Inc. (EOI) for the Grand Gulf Nuclear Station (GGNS), could not be approved at this time on a permanent basis. A telephone conference between NRC, IP and EOI personnel was conducted on February 3, 1995 to discuss the status of the NRC's review and the basis for their current position. NRC staff personnel (Containment Systems and Severe Accident Branch) indicated that more time is needed to complete a thorough review of the CPS and GGNS submittals.

The NRC staff acknowledged that drywell bypass leakage performance at CPS to date demonstrates that a large margin exists between the actual leakage rate and the Technical Specification limit, and that such leak tightness is further indicated by the fact that the drywell continues to pressurize during plant operation (due to consumption and leakage of instrument air by pneumatic operators, etc.) and is thus required to be periodically vented. On this basis, and in light of the fact that IP had anticipated timely receipt of an approved amendment and had planned accordingly for its forthcoming refueling outage, the NRC staff has indicated that a one-time Technical Specification change could be approved to permit the drywell bypass leakage test to not be performed during the forthcoming refueling outage at CPS. In the short run, this will acceptably resolve the issue for the fifth refueling outage at CPS, and IP will look forward to receipt of such a license amendment in the near future.

With respect to IP's outstanding request for a permanent change to the drywell bypass leakage test frequency, it is IP's understanding that the NRC will continue its review and evaluation of IP's request for a such a change. IP's docketed request will thus remain open, notwithstanding receipt of the license amendment that exempts performance of the drywell bypass leakage test during RF-5.

Sincerely yours,



Richard F. Phares
Director, Licensing

TBE/csm

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