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JGC-243-95
June 9, 1995
10CFR50.90

Docket No. 50-461

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

Subject: Clinton Power Station Proposed Amendment of
Facility Operating License No. NPF-62 (LS-95-005)

Dear Sir:

Pursuant to 10CFR50.90, Illinois Power (IP) hereby applies for amendment of Facility Operating License No. NPF-62, Appendix A - Technical Specifications, for Clinton Power Station (CPS). This request consists of proposed changes to Technical Specification (TS) 4.1, "Site Location," and is being submitted at the NRC's request as a followup activity for IP's conversion to the Improved Technical Specifications. The proposed changes incorporate a description of the exclusion area boundary. The NRC staff has determined that such a change is necessary to ensure the content of the Technical Specifications conforms to Section 182 of the Atomic Energy Act of 1954. This docketed NRC staff position was expressed in a Safety Evaluation accompanying a license amendment recently issued to another utility (Docket Nos. 50-317 and 50-318).

A description of the proposed changes and the associated justification (including a Basis For No Significant Hazards Consideration) are provided in Attachment 2. A marked-up copy of the affected page from the current CPS Technical Specifications is provided in Attachment 3. An affidavit supporting the facts set forth in this letter and its attachments is provided in Attachment 1.


IP has reviewed the proposed changes against the criteria of 10CFR51.22 for categorical exclusion from environmental impact considerations. The proposed changes do not involve a significant hazards consideration, or significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, IP concludes that the proposed changes meet the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.

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Please note that it is our understanding, based on discussions with the NRC Licensing Project Manager for CPS, that review fees for processing this amendment request will be charged to generic development of the Improved Technical Specifications.

Sincerely yours,


J. G. Cook
Vice President

DAS/csm

Attachments

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

J. G. Cook, being first duly sworn, deposes and says: That he is Vice President of Illinois Power; 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 9 day of June 1995.

Signed: _____

J. G. Cook

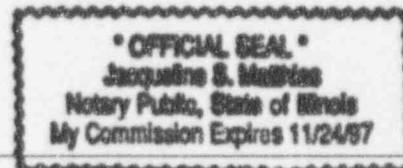
STATE OF ILLINOIS

} SS.

DeWitt COUNTY

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Subscribed and sworn to before me this 9th day of June 1995.



(Notary Public)
Jacqueline S. Matthias

Background

By Amendment No. 95 to the Clinton Power Station (CPS) Technical Specifications (TS), the NRC approved implementation of a revised set of TS in the format of NUREG-1434, "Standard Technical Specifications, General Electric Plants, BWR/6," Revision 0, September 1992. Conversion to these Improved Technical Specifications (ITS) was performed on an industry "lead-plant" basis and involved changes not only to the format of the TS, but also to the technical content of the TS. Specifically, as part of this "conversion" to the ITS, TS Section 5.1, "Site," was revised as a certain amount of detail was eliminated. Subsequent to issuance of Amendment No. 95, the NRC identified that certain information must be retained in this TS Section in order to fully satisfy the Atomic Energy Act of 1954. This proposed change restores this required information to the TS.

Prior to issuance of Amendment No. 95, TS Section 5.1, "Site," consisted of three separate parts: Section 5.1.1, "Exclusion Area," included reference to a figure that identified the exclusion area boundary (EAB); Section 5.1.2, "Low Population Zone," included reference to a figure that identified the low population zone, and Section 5.1.3, "Map Defining Unrestricted Areas and Site Boundary for Radioactive Gaseous and Liquid Effluents," included reference to a figure that identified plant structures, radioactivity release points, unrestricted areas, and the site boundary. As part of the conversion to the Improved Technical Specifications, Section 5.1 (now Section 4.1) was replaced with a brief description of the site location as the associated figures were relocated. This description states that "(t)he site for Clinton Power Station is located in Harp Township, DeWitt County, approximately six miles east of the city of Clinton in east-central Illinois." The information previously contained in Section 5.1 of the CPS TS, including the information regarding the EAB, was relocated to the CPS Updated Safety Analysis Report (USAR).

Subsequent to issuing Amendment No. 95 of the CPS Operating License and during NRC review of the ITS conversion for the Grand Gulf Nuclear Station, the NRC staff identified that the definition of EAB is required to be included in the TS in order to fully comply with Section 182 of the Atomic Energy Act of 1954. This NRC staff position was expressed on the docket in a Safety Evaluation accompanying a license amendment issued to another utility in March, 1995 (Docket Nos. 50-317 and 50-318). Consistent with the NRC's position, and at the NRC staff's request, this proposed change restores identification of the EAB, in the form of a textual description, to the CPS TS (Section 4.1).

Description of Proposed Change

In accordance with 10CFR50.90, IP proposes that CPS TS 4.1, "Site Location," be supplemented with the addition of the following sentence:

"The exclusion area boundary shall have a radius of 975 meters from the Standby Gas Treatment System vent."

This proposed change to the CPS TS is reflected in Attachment 3.

Justification for Proposed Change

The location of the EAB was identified as a circle centered on the Standby Gas Treatment System vent on TS Figures 5.1.1-1 and 5.1.2-1 prior to issuance of Amendment No. 95. In addition, the EAB location is identified on Figures 1.2-1 and 1.2-2 of the CPS USAR. The physical location or configuration of the EAB has not been changed, only the controls on future changes to the EAB. This change makes the TS more restrictive by requiring future changes to the EAB to receive prior NRC approval via the license amendment process (10 CFR 50.90). This is in accordance with Section 182 of the Atomic Energy Act of 1954. Based on the above, the proposed change is considered to be administrative.

Basis for No Significant Hazards Considerations

Illinois Power (IP) proposes to change the current Clinton Power Station (CPS) Technical Specifications to add a textual description of the exclusion area boundary (EAB). In accordance with 10CFR50.92, a proposed change to the operating license (Technical Specifications) involves no significant hazards consideration if operation of the facility in accordance with the proposed change would not (1) involve a significant increase in the probability or consequences of any accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. This request is evaluated against each of these criteria below.

- (1) The proposed change does not involve a change to the plant design or operation. As a result, the proposed change does not affect any of the parameters or conditions that could contribute to the initiation of any accidents previously evaluated. In addition, the physical location of the EAB has not been changed; a description of its location has merely been added to the TS. Thus, the proposed change cannot increase the probability or the consequences of any accident previously evaluated.
- (2) The proposed change does not involve a change to the plant design or operation. As a result, the proposed change does not affect any parameter or condition that could contribute to the initiation of any accidents. Thus, the proposed change cannot create the possibility of a new or different kind of accident from any accident previously evaluated.
- (3) The proposed change only affects regulatory controls on the accepted configuration of the EAB. The proposed change does not involve an actual change to the location of the EAB. The proposed change will restore compliance

with the Atomic Energy Act of 1954 and require prior NRC approval of any changes to the physical location of the EAB. As a result, IP has concluded that the proposed change will not result in a reduction in the margin of safety.

Based on the foregoing, IP concludes that this request does not involve a significant hazards consideration.