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J. Stephen Perry
Vice President

JSP-0667-91

October 22, 1991

U-601858

L47-91(10-22)-LP

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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

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 6.2.3.2, "COMPOSITION", which is a subsection of 6.2.3, "INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)". A description of the proposed Technical Specification change, the associated justification (including a Basis For Significant Hazards Consideration), and a marked-up copy of the page from the current Technical Specifications are provided in Attachment 2. In addition, 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 the amounts or change the types of effluents that may be released offsite, nor do they 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.

Sincerely yours,

J. S. Perry
Vice President

JCA/alh

Attachments

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

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STATE OF ILLINOIS
COUNTY OF DEWITT

John G. Cook, being first duly sworn, deposes and says: That he is Manager of Illinois Power's Clinton Power Station and has been duly authorized to submit his application for amendment of Facility Operating License NPF-62; 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 application and the facts contained therein are true and correct.

DATE: This 22 day of October 1991

Signed: _____

John G. Cook

Subscribed and sworn to before me this 22 day of October 1991.

Notary Public

Background

NUREG-0737, "Clarification of TMI Action Plan Requirements," Section I.B.1.2 required all applicants for an operating license to implement an Independent Safety Engineering Group (ISEG). Thus, Clinton Power Station (CPS), with the issuance of its operating license in 1986, established an ISEG at CPS. Per NUREG-0737 and the CPS Technical Specifications, the principal function of the ISEG is to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports (LERs) and other appropriate sources of plant design and operating experience information that may indicate areas for improving plant safety. The ISEG also performs independent reviews of plant activities including maintenance, operational problems, and operational analyses. Where useful improvements can be achieved, the ISEG develops and presents detailed recommendations to corporate management.

NUREG-0737 (nor its listed references of NUREG-0660, "NRC Action Plan Developed as a Result of the TMI-2 Accident," and NUREG-0694, "TMI-Related Requirements for New Operating Licenses") did not specify any minimum qualification requirements for members of the ISEG. It only called for an "increase in the available technical expertise located onsite" and to "provide continuing, systematic, and independent assessment of plant activities." In the spirit of this concept, a more knowledgeable and experienced ISEG should produce higher quality and more useful recommendations for improvement as envisioned by NUREG-0737. The current CPS Technical Specifications prohibit highly trained and experienced personnel from the Operations Department who do not possess a bachelor's degree in engineering or related science from being members of the ISEG, even though a significant portion of ISEG evaluations involve reviews of plant activities involving operating activities.

Description of Proposed Changes

In accordance with 10CFR50.90, IP proposes to change CPS Technical Specification 6.2.3.2, which describes the composition of the ISEG, to provide a second set of acceptable qualifications for ISEG members. The proposed change would allow a person who holds or has held a CPS Senior Reactor Operator (SRO) license and has at least five years of nuclear power experience to be a member of the ISEG. IP also proposes to include a restriction which would require at least four of the ISEG members to hold a bachelor's degree in engineering or related science. This restriction would limit the number of non-degreed SROs to no more than one of the five required ISEG members. The proposed changes are indicated on the attached marked-up page from the CPS Technical Specifications. (See page 4 of this request.)

Justification for Proposed Change

This proposed change would allow a person with a current or previously held SRO license for CPS and five years of experience in the nuclear field to be substituted in lieu of a person with a bachelor's degree in engineering or related science. The ability to add such an experienced Operations person to the CPS ISEG staff would be very valuable by enhancing the ISEG's knowledge level and insight in the areas of plant operating activities. This proposed change would also provide an additional career path option for SRO personnel.

The criterion included in CPS Technical Specification 6.2.3.2 for requiring a bachelor's degree stems from Section II.B.2.b of NUREG-0731, "Guidelines for Utility Management Structure and Technical Resources," which states, "Qualification requirements for these individuals [members of ISEG] should be at a level generally comparable to that described in Section 4.2 of ANSI/ANS 3.1 (December 1979 draft), i.e., a bachelor's degree in engineering with two to four years experience in their field, or equivalent as described in Section 4.1 of ANSI/ANS 3.1." However, Section 4.1 of ANSI/ANS 3.1 (December 1979 draft) also states, "Individuals who do not possess the formal education requirements specified in this section shall not be automatically eliminated where other factors provide sufficient demonstration of their abilities. These other factors should be evaluated on a case-by-case basis."

The level of training and knowledge required to obtain an SRO license is well documented and known. The proposed change to Technical Specification 6.2.3.2 would provide the ability of the CPS ISEG to broaden its expertise with direct first-hand operations experience. As noted previously, the proposed change would also require five years of experience in the nuclear field. This is above the current experience requirement of three years for ISEG members and is in accordance with Section 4.7.2 of ANS 3.1-1981. Further, under the proposed change, the Technical Specifications would continue to require that at least four of the required ISEG members hold a bachelor's degree in engineering or related science.

In summary, the proposed change would provide the opportunity to increase the knowledge and experience level of the CPS ISEG in nuclear power plant operating activities without any discernible reduction in technical knowledge or skills. Hence, if the proposed option is utilized, it would increase the quality of ISEG evaluation recommendations in the area of plant operating activities.

Basis For No Significant Hazards Consideration

In accordance with 10CFR50.92, a proposed change to the operating license (Technical Specifications) involves no significant hazards considerations 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, or (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. The proposed change is evaluated against each of these criteria as follows.

1. The proposed change is administrative in nature as it only addresses the qualification requirements of ISEG members and does not alter any plant equipment, system configurations, or operation. As a result, the proposed change cannot increase the probability or the consequences of any accident previously evaluated.
2. The proposed change only addresses the qualification requirements of ISEG members. The proposed change does not alter any plant equipment, system configurations or analyses. As a result, this proposed change does not introduce any new failure modes. Therefore, 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 addresses the qualification requirements of ISEG members. The proposed alternate qualification requirement of currently or previously holding an SRO license for CPS and having at least five years experience in the nuclear field is consistent with the qualification requirements recommended in Section 4.7.2 of ANS 3.1-1981. Additionally, the proposed change will continue to require that at least four of the ISEG members hold a bachelor's degree in engineering or related science. As a result, the proposed change will enhance the quality, knowledge level, and insight of the CPS ISEG in the areas of plant operations without any discernible reduction in technical knowledge or skills. Therefore, the proposed change will not result in a significant reduction in any margin of safety.

Based upon the foregoing, Illinois Power has concluded that this proposed change does not involve a significant hazards consideration.