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August 14, 1995

Docket No. 50-461

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

Attention: R. C. Jones, Jr., Chief  
Reactor Systems Branch

Subject: Request for Review of General Electric Letter as a  
Cost Beneficial Licensing Action for Clinton Power Station

Dear Mr. Jones:

The purpose of this letter is to request that the action requested by the General Electric (GE) letter supporting a change in the mislocated fuel bundle event acceptance criteria (reference GE letter, J. F. Klapproth to NRC Document Control Desk, "Mislocated Fuel Bundle Event Licensing Basis Change," dated June 23, 1995) be considered a cost beneficial licensing action (CBLA) for Clinton Power Station (CPS) in accordance with NRC Administrative Letter 95-02, "Cost Beneficial Licensing Actions." GE's letter requested that the mislocated fuel bundle event acceptance criteria be changed to be consistent with the classification as an accident. Illinois Power (IP) understands that designating the acceptance criteria change requested in the GE letter as a CBLA will support a more prompt NRC review, thereby providing CPS with more immediate cost savings.

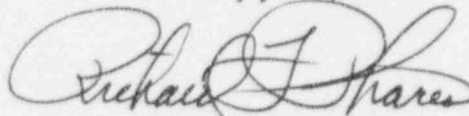
GE's request is based on the low probability of initiating plant startup with a mislocated fuel bundle. The request identifies that at least three independent verifications would have to fail to identify the mislocated fuel bundle for this event to occur. The resulting event probability is consistent with the classification of an accident. IP considers GE's evaluation to be applicable to CPS since CPS procedures require at least as many independent verifications of the core configuration to be performed as is assumed in the GE evaluation.

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The mislocated fuel bundle event is the most limiting event for the current CPS core design. This is expected to remain true for our upcoming operating cycles due to the relatively low minimum critical power ratio (MCPR) operating limits in BWR/6's, and our plan to design for high discharge exposures. IP has estimated a fuel cost savings of approximately \$300,000 per operating cycle (based on GE's estimate of a 0.01 change in CPR being equivalent to \$100,000 per operating cycle) as a result of plant operation with a less restrictive MCPR operating limit. This translates to approximately \$6,000,000 savings over the remaining life of the plant with the current reload fuel design. This exceeds the minimum cost saving criteria for CBLAs of \$100,000 as identified in NRC Administrative Letter 95-02.

Sincerely yours,



Richard F. Phares  
Director, Licensing

DAS/csm

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