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J. Stephen Perry  
Vice President

JSP-095-92  
February 21, 1992

U-601938  
L47-92(2-21)-LP  
8E.100a

Docket No. 50-461

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Nuclear Regulatory Commission  
Washington, D.C. 20555

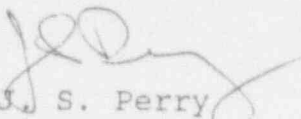
Subject: Clinton Power Station  
Proposed Amendment of Facility  
Operating License No. NPF-62

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 a proposed change to Technical Specification 6.3, "Unit Staff Qualifications," in order to delete an inappropriate exception to the applicable ANSI standard as specified in Technical Specification 6.3.1 regarding qualification requirements for the Director - Plant Radiation Protection. A description of the proposed Technical Specification change, the associated justification (including a Basis For No 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 change against the criteria of 10CFR51.22 for categorical exclusion from environmental impact considerations. The proposed change does not involve a significant hazards consideration, or significantly increase the amounts or change the types of effluents that may be released offsite, nor does it significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, IP concludes that the proposed change meets the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement.

Sincerely yours,

  
J. S. Perry  
Vice President

TBE/alh

Attachments

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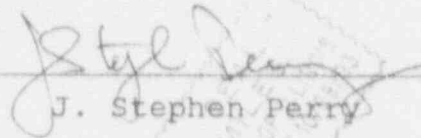
cc: NRC Clinton Licensing Project Manager  
NRC Resident Office  
Regional Administrator, Region III, USNRC  
Illinois Department of Nuclear Safety

STATE OF ILLINOIS  
COUNTY OF DEWITT

J. Stephen Perry, 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 application and the facts contained therein are true and correct.

DATE: This 21 day of February 1992

Signed: \_\_\_\_\_

  
J. Stephen Perry

Subscribed and sworn to before me this 21 day of February 1992.



Notary Public

### Background/Description of Proposed Change

Qualification requirements for plant staff members are prescribed under Technical Specification 6.3, "Unit Staff Qualifications." Technical Specification 6.3.1 currently states, "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 except for the Director - Plant Radiation Protection who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975." The intent of this exception for the Director - Plant Radiation Protection is to impose stricter qualification requirements for this position relative to an earlier version of this ANSI standard. IP has determined that this exception is appropriate and necessary relative only to the 1971 version of this ANSI standard and not to the 1978 version. As this Technical Specification requires compliance with the 1978 version, the exception is redundant and inappropriate. Therefore, IP proposes to delete this phrase from Technical Specification 6.3.1 as indicated on the enclosed marked-up page from the CPS Technical Specifications and as further explained below.

### Basis/Justification for Proposed Change

Due to a recent review of the basis for the exception specified in Technical Specification 6.3.1, it was noted that the September 1975 version of Regulatory Guide 1.8, "Personnel Selection and Training," was written to address endorsement of ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel." (ANSI N18.1-1971 was the latest version of the applicable ANSI standard at that time.) Although this ANSI standard did prescribe qualification requirements for supervisory-level radiation protection personnel (Ref. Section 4.4.4)\*, the NRC determined, as documented in the Regulatory Guide, that the recommended qualification requirements were insufficient.

The NRC indicated in the Regulatory Position section of Regulatory Guide 1.8 (1975), "The criteria for the selection and training of nuclear power plant personnel contained in ANSI N18.1-1971...are generally acceptable and provide an adequate basis for the selection and training of nuclear power plant personnel except for the position Supervisor - Radiation Protection (hereafter referred to as the Radiation Protection

\* ANSI N18.1-1971 recommended that the responsible person (in the area of radiation protection) "have a minimum of five years experience in radiation protection at a nuclear reactor facility. A minimum of two years of this five years experience should be related technical training. A maximum of four years of this five years experience may be fulfilled by related or academic training."

Manager [RPM])." Specifically, the following enhanced qualification requirements were prescribed for the RPM:

The Radiation Protection Manager (RPM) should be an experienced professional in applied radiation protection at nuclear facilities dealing with radiation protection problems and programs similar to those at nuclear power stations. The RPM should be familiar with the design features and operations of nuclear power stations that affect the potential for exposures of persons to radiation. The RPM should have the technical competence to establish radiation protection programs and the supervisory capability to direct the work of professionals, technicians, and journeymen required to implement the radiation protection programs.

The RPM should have a bachelor's degree or the equivalent in a science or engineering subject, including some formal training in radiation protection. The RPM should have a least five years of professional experience in applied radiation protection. (A master's degree may be considered equivalent to two years of professional experience where course work related to radiation protection is involved.) At least three years of this professional experience should be in applied radiation protection work in a nuclear facility dealing with radiological problems similar to those encountered in nuclear power stations, preferably in an actual nuclear power station.

After issuance of the September 1975 version of Regulatory Guide 1.8, ANSI N18.1-1971 was revised and renumbered to ANSI/ANS 3.1-1978. As a part of this revision, section 4.4.4 was revised, incorporating the qualification requirements specified for the RPM in Regulatory Guide 1.8 (1975). With respect to the qualification requirements for the RPM, the combination of ANSI N18.1-1971 and the qualification enhancements/exception provided in Regulatory Guide 1.8 thus became equivalent to ANSI/ANS 3.1-1978.

At one time, as it appeared in the draft CPS Technical Specifications, Technical Specification 6.3.1 referred to ANSI N18.1-1971 (along with the exception referring to Regulatory Guide 1.8). Later, during further development of the draft Technical Specifications for CPS, this reference was changed to ANSI/ANS 3.1-1978 consistent with the version of the standard referenced in the CPS USAR. This effectively rendered the exception specified for the Director-Plant Radiation Protection redundant due to the incorporation of the Regulatory Guide 1.8 guidance in the 1978 version of the associated ANSI standard. However, the exception was not deleted from the draft Technical Specifications at that time.

In light of the above, IP has determined that it is appropriate to delete the exception specified in CPS Technical

Specification 6.3.1 to eliminate the redundancy. Further, deletion of this wording from Technical Specification 6.3.1 eliminates an unnecessary reference to a specific job/position title in the CPS plant staff organization. Consistent with the intent of Generic Letter 88-06 (Subject: Removal of Organizational Charts from Technical Specification Administrative Control Requirements), this change could prevent unnecessary changes to the Technical Specifications (and thus eliminate unnecessary license amendments) in the future due to title/organizational changes involving the "Director-Plant Radiation Protection."

It should be emphasized that the proposed change does not involve a change to the qualification requirements for unit staff personnel including the position that is equivalent to the "responsible person (Professional - Technical, Radiation Protection)" identified in the ANSI standard or the "Radiation Protection Manager" identified in Regulatory Guide 1.8. The reference to ANSI/ANS 3.1-1978 in Technical 6.3.1 remains unchanged consistent with IP's commitment to this standard as identified in the CPS USAR.

#### 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, (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 pertains to qualification requirements for unit staff personnel (in the area of radiation protection) and does not affect any plant equipment, system configurations, or operation. Furthermore, though the proposed change pertains to qualification requirements for unit staff personnel, the proposed change does not involve a technical change to these qualification requirements since the requirements of Regulatory Guide 1.8, September 1975 are contained in ANSI/ANS 3.1-1978. As a result, the proposed change cannot increase the probability or the consequences of any accident previously evaluated.
- (2) As noted above, the proposed change only concerns the qualification requirements for a particular plant staff member(s) and does not involve any changes to plant equipment, system configurations or analyses. As a result, this proposed change does not introduce any new failure modes and cannot create the possibility of a new



or different kind of accident from any accident previously evaluated.

- (3) The proposed change specifically and only addresses a textual change to the administrative control requirement concerning the qualification requirements of the radiation protection supervisor/manager position within the plant staff organization. The proposed change only eliminates a redundant requirement and would not alter the qualification requirements for this position since the requirements of Regulatory Guide 1.8, September 1975 are contained in ANSI/ANS 3.1-1978 (which is referenced in the Technical Specifications). 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.