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J. Stephen Perry  
Senior Vice President

U-602052  
L47-92 (10-16)LP  
8E.100a

Docket No. 50-461

10CFR50.90  
JSP-0529-92  
October 16, 1992

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

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

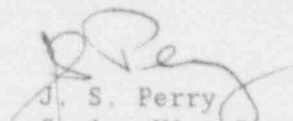
Dear Sir:

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 the CPS Technical Specifications to support CPS compliance with the new requirements of Title 10 Code of Federal Regulations Part 20. These proposed changes are necessary to reflect implementation of the CPS Radiation Protection Program in accordance with 10CFR20.1101. A description of the proposed changes, the associated justifications (including a basis for No Significant Hazards Consideration), and a marked-up copy of the affected pages of 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.

CPS is currently scheduled to fully implement the requirements of the new 10CFR20 on April 1, 1993. Therefore, IP requests that the license amendment be approved prior to April 1, 1993, but not be required to be implemented until that date.

IP has reviewed the proposed change 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 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  
Senior Vice President

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Attachments


cc: NRC Clinton Licensing Project Manager  
NRC Resident Office, V-690  
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 say.:  
That he is Senior 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.

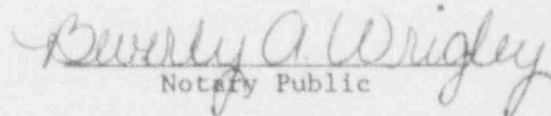
DATE: This 14 day of October 1992

Signed

  
J. Stephen Perry

Subscribed and sworn to before me this 16<sup>th</sup> day  
of October 1992.



  
Notary Public

### Background

On May 21, 1991, the Nuclear Regulatory Commission (NRC) issued a revision to its standards for protection against ionizing radiation, 10CFR Part 20. The purpose of the revision to 10CFR20 was to modify the NRC's radiation protection standards to reflect developments in the principles and scientific knowledge underlying radiation protection and to reflect changes in the basic philosophy of radiation protection. In addition, the revision addresses International Radiation Protection Standards in order to achieve a better level of uniformity with the requirements of other nations.

Revised Part 20 became effective on June 20, 1991; however, in accordance with more recent provisions, licensees may defer implementation of the revised rule until January 1, 1994. In accordance with section 20.1008(b), "[a]fter the time the licensee implements 20.1001-20.2401, the applicable section of 20.1001-20.2401 shall be used in lieu of any section in 20.1-20.601 of this part that is cited in licensee conditions or Technical Specifications, except as specified in paragraphs (c), (d) and (e) of this section." Notwithstanding, this request involves proposed changes to CPS Technical Specifications to reflect implementation of the revised Part 20 at CPS.

### Description of Proposed Changes

In accordance with 10CFR50.90, the following changes to the CPS Technical Specifications are being proposed:

1. Definitions 1.24, MEMBER(S) OF THE PUBLIC, and 1.49, UNRESTRICTED AREA, are being revised to conform to the definitions of these terms as provided in section 20.1003.
2. Technical Specification 6.8.4.f is being revised to provide proper references to 10CFR20 as a result of the new section numbers. Specifically, Specifications 6.8.4.f.2 and 7 are being revised to reference Appendix B, Table 2 as opposed to the currently referenced Table II, and Specification 6.8.4.f.3 is being revised to reference 10CFR20.1302 as opposed to 10CFR20.106.
3. Note "\*" of Technical Specification 6.9.1.5.a is being revised to reference section 20.2206 vice section 20.407.
4. Technical Specification 6.10.2.f is being deleted and moved to 6.10.3.o. The remaining items in Specification 6.10.2 are being relettered as appropriate.
5. Technical Specification 6.10.3.c is being revised to provide clarification consistent with the requirements in the revised 10CFR20. Specifically, the revision requires retention of dose records only for those individuals for whom monitoring is required as opposed to all individuals who enter radiation control areas as is currently identified.

6. Technical Specification 6.12.1 is being revised to reference paragraph 20.1601 as opposed to the current reference of 20.203(c)(2).
7. Technical Specifications 6.12.2 and 6.12.3 are being revised to provide wording consistent with the definition of high radiation area as provided in section 20.1003.
8. Technical Specification 6.14.a.2 is being revised to reference 10CFR20.1302 as opposed to 10CFR20.106.
9. In addition to the above changes, the Bases section for Technical Specification 3/4.7.7 is being revised to reference Appendix B, Table 2 as opposed to the currently-referenced Table II.

#### Justification For Proposed Changes

In accordance with 10CFR20.1101, IP is required to "...develop, document and implement a radiation protection program commensurate with the scope and extent of licensed activities and sufficient to ensure compliance with the provisions of this part." Revision of the CPS Technical Specifications is required to ensure consistency with the requirements in 10CFR20 and is part of the CPS program to implement revised Part 20.

Upon issuance of Amendment 40 to the CPS Operating License, IP completed its implementation of Generic Letter 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual or to the Process Control Program." The implementation of Generic Letter 89-01 resulted in the relocation of portions of the Radiological Effluent Technical Specifications (RETS) involving radioactive effluent monitoring instrumentation, the control of liquid and gaseous effluents, equipment requirements for liquid and gaseous effluents, radiological environmental monitoring, and radiological reporting details from the Technical Specifications to the Offsite Dose Calculation Manual (ODCM). As a result, the impact of revised 10CFR20 on the CPS Technical Specifications is primarily limited to the revision of definitions and the correction of references to conform to the new or renumbered sections of 10CFR20. In addition, the Technical Specifications will be revised to recognize the new monitoring and record-keeping requirements as identified in 10CFR20. This overall change to the CPS Technical Specifications does not alter any of IP's requirements or responsibilities for protection of the public and employees against radiation hazards. Consequently, this change is editorial only.

#### 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

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 below:

- (1) The proposed changes only consist of revisions to 10CFR20 references to recognize the new section numbers, definitions to ensure consistency with 10CFR20, and administrative controls for record keeping to maintain compliance with the new Part 20. Since these are editorial changes which do not impact the operation or design of any plant structures, systems or components, this proposed change cannot increase the probability or the consequences of any accident previously evaluated.
- (2) The proposed changes are editorial only and do not affect the plant design or operation. As a result, this proposed change cannot create the possibility of a new or different kind of accident from any accident previously evaluated.
- (3) The proposed changes are editorial in nature and do not affect the plant design or operation. The changes will not 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. These changes only ensure compliance with revised 10CFR20. These changes do not alter any of the requirements or responsibilities for protection of the public and employees against radiation hazards. As a result, these changes cannot reduce a margin of safety.

Based upon the foregoing, IP concludes that these proposed changes do not involve a significant hazards consideration.