



Illinois Power Company
Clinton Power Station
P.O. Box 678
Clinton, IL 61727
Tel 217 935-6226

J. Stephen Perry
Vice President

U-602096
L47-93(02-11)-LP
8E.100a

JSP-064-93
February 11, 1993

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

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 6.9.1.7, "Semiannual Radioactive Effluent Release Report." This proposed change will bring the CPS Technical Specifications in compliance with the amended 10CFR50.36a requirements which change the submittal frequency of the report from semiannually to annually. Additionally, the proposed change will adjust the period of time allowed for submitting each report after January 1 of each year from 60 to 90 days, per discussion with the NRC staff.

A description of the proposed change and the associated justification (including the Basis For No Significant Hazards Consideration) are provided in Attachment 2. A marked-up copy of the affected page from the current Technical Specifications is provided in Attachment 3. 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 off-site, nor does it significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, IP concludes the proposed change

9302180136 930211
PDR ADOCK 05000461
P PDR

1001/11

meets 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

CLJ/mfm

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
COUNTRY OF DEWITT

J. Stephen Perry, being first duly sworn, deposes and says: 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: his 11 day of February, 1993.

Signed: _____

J. S. Perry

Subscribed and sworn to before me this 11 day of February, 1993.

Notary Public

Background

In response to several Presidential memoranda on reducing the burden of government regulation, the Nuclear Regulatory Commission directed its Committee to Review Generic Requirements (CRGR) to review the existing NRC regulations to determine whether regulatory burdens could be reduced without reducing the protection for the public health and safety and the common defense and security. One recommended change to the regulations, which was subsequently approved, involved changing the required submittal frequency of the "Semiannual Radioactive Effluent Release Report" from semiannually to annually as promulgated in 10CFR50.36a, "Technical Specifications on Effluents from Nuclear Power Reactors." Since this report is described in detail in Clinton Power Station (CPS) Technical Specification 6.9.1.7, and since the report is referenced by name (as the "Semiannual Radioactive Effluent Release Report") in many places throughout the Specifications, a Technical Specification amendment is required to incorporate this new annual submittal frequency.

Description of the Proposed Changes

The proposed changes revise those CPS Technical Specifications involving the Semiannual Radioactive Effluent Release Report in order to be consistent with the requirements of 10CFR50.36a concerning submittal frequency. In accordance with 10CFR50.90, the following changes are being proposed:

- a. Throughout CPS Technical Specifications the subject report is currently referred to by the name "Semiannual Radioactive Effluent Release Report." References to this report within Specification 6.9.1.7 and in other sections of the Technical Specifications listed below will now be revised to refer to the "Radioactive Effluent Release Report."
 1. INDEX: Technical Specification 6.9.1, "Routine Reports";
 2. Technical Specification 1.26, "Offsite Dose Calculation Manual (ODCM)";
 3. Technical Specification 3.7.7, "Liquid Storage Tanks," Action a;
 4. Technical Specification 6.9.1.7, "Semiannual Radioactive Effluent Release Report"; and
 5. Technical Specification 6.14, "Offsite Dose Calculation Manual (ODCM)."
- b. Technical Specification 6.9.1.7 "Semiannual Radioactive Effluent Release Report" is being revised to replace the requirement that the Radioactive Effluent Release Report cover the previous "6 months" of operation with the requirement that the report cover the previous "12 months" of operation. Additionally, the requirement to submit the Report "within 60 days after January 1 and July 1 of each year" will be revised to read "within 90 days after January 1 of each year."

The proposed changes are reflected on the marked-up copies of pages from the CPS Technical Specifications contained in Attachment 3.

Justification for the Proposed Change

This proposed amendment would revise the Technical Specifications involving the Semiannual Radioactive Effluent Release Report in order to be consistent with the submittal frequency requirements of 10CFR50.36a, effective October 1, 1992 (57 FR 39353, August 31, 1992). The proposed changes are purely administrative in that they incorporate the changes that were codified by the 10CFR50.36a rulemaking. Being administrative in nature, the proposed changes have no impact on plant equipment or methods of operation.

As described previously, IP is revising the time limit for submitting the Radioactive Effluent Release Report from within 60 days after January 1 and July 1 of each year to within 90 days after January 1 of each year. The time of year or period of time permitted for submitting the Radioactive Effluent Release Report following the period of operation addressed by the report is not specified in 10CFR50.36a. However, generic guidance is currently being developed by the NRC staff to provide licensees with recommended changes to the Technical Specifications consistent with the 10CFR20 and 10CFR50.36a as amended. Based on discussions with the NRC staff, it is understood this generic guidance will prescribe that licensees revise their Technical Specifications to require the Radioactive Effluent Release Report be submitted within 90 days after January 1 of each year. According to the NRC staff, 90 days from January 1 is an acceptable period of time for licensees to complete the gathering of data and prepare the Radioactive Effluent Release Report for submittal to the NRC.

Basis for No Significant Hazards Consideration

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, 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 changes are evaluated against each of these criteria below.

- (1) The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change is designed to conform the CPS Technical Specifications to changes in the NRC regulations (in this case, 10CFR50.36a). As described within the discussion of the final rule in the Federal Register, the proposed action (i.e., the proposed change to 10CFR50.36a) "will not reduce the protection of the public health and safety or the common defense and security." The proposed changes to the CPS Technical Specifications are

consistent with this intent as they are designed to remove inconsistencies between CPS Technical Specifications and 10CFR50.36a and do not affect plant operation in any way. The proposed changes do not result in a change to plant systems and have no effect on accident conditions or assumptions. The proposed changes are to reporting requirements only and do not affect possible initiating events for accidents previously evaluated, or any system functional requirements. Therefore, the proposed changes to the subject Technical Specifications cannot increase the probability or consequences of an accident previously evaluated.

- (2) The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

As stated above, the proposed changes are administrative in nature. The proposed changes do not affect the reactor coolant pressure boundary or any other plant systems or structures, nor do they affect any system functional requirements or operability requirements. Consequently, no new failure modes are introduced as a result of the proposed changes, and therefore the proposed changes cannot initiate any new or different kind of accident.

- (3) The proposed changes do not result in a significant reduction in the margin of safety.

The proposed changes are administrative in nature and do not affect any Updated Safety Analysis Report (USAR) design bases, accident assumptions, or Technical Specification Bases. Therefore, the proposed changes do not result in the reduction in any margin of safety.

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