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10CFR50.12
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 10CFR50.12 and 10CFR50.90, Illinois Power Company (IP) hereby applies for partial exemptions from the requirements of 10CFR50 Appendix J and an associated amendment of Facility Operating License No. NPF-62 and Appendix A - Technical Specifications for Clinton Power Station (CPS). This request consists of three proposed partial exemptions from the requirements of 10CFR50 Appendix J regarding containment integrated leakage rate testing, three proposed changes to associated CPS Technical Specification 3/4.6.1.2, "Primary Containment Leakage," and changes to the CPS Technical Specification Bases and Operating License NPF-62 to reflect NRC approval of the proposed partial exemptions.

For each of the proposed partial exemptions noted above, a description of the requested exemption, the associated justification, and a description of the special circumstances (as required by 10CFR50.12) are provided in Attachment 2. In addition, Attachment 2 provides a description and the associated justification (including a Basis for No Significant Hazards Consideration) for each of the proposed operating license and Technical Specification changes noted above. Marked-up copies of pages from the current operating license, Technical Specifications and Bases for CPS are provided in Attachment 3. Further, 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

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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.

Please note that IP desires to implement this request during the fourth refueling outage at CPS (which is currently scheduled to begin September 26, 1993). Therefore, IP requests that this application be reviewed on a schedule sufficient to support this outage.

Sincerely yours,


J. S. Perry
Senior Vice President

DAS/msh

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 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: This 17 day of February, 1993.

Signed: _____

J. Stephen Perry
J. Stephen Perry

Subscribed and sworn to before me this 17th day of February, 1993.

Linda S. French
Notary Public



Background

In order to ensure offsite doses remain below those previously evaluated in the event of a design basis accident, leakage from the primary containment must be limited. To ensure that containment leakage remains within these limits, periodic leakage rate tests are performed. Specifically, 10CFR50.54(e) requires primary reactor containments for water cooled power reactors to be subject to the leakage rate testing requirements set forth in Appendix J to 10CFR50. Clinton Power Station (CPS) Technical Specification (TS) 3/4.6.1.2, "Primary Containment Leakage," provides additional requirements for performing leakage rate testing and specifies the associated limits. The leakage rate testing program for CPS is described in Section 6.2.6 of the CPS Updated Safety Analysis Report (USAR).

As described in detail below, IP is proposing to revise TS 3/4.6.1.2 to make several changes to the associated leakage rate testing requirements. The proposed changes also necessitate that IP request partial exemptions from 10CFR50 Appendix J in accordance with 10CFR50.12.

Description of Proposed Changes

In accordance with 10CFR50.12, Illinois Power (IP) is requesting the following partial exemptions from 10CFR50 Appendix J:

- (1) A partial exemption from the 10CFR50, Appendix J, Section III.A.1.(a) requirement to stop a Type A test [containment integrated leakage rate test (CILRT)] if excessive leakage is detected.
- (2) A partial exemption from the 10CFR50, Appendix J, Section III.D.1.(a) requirement to perform the third Type A test of each 10-year service period when the plant is shut down for the 10-year plant inservice inspections.
- (3) A partial exemption from the 10CFR50, Appendix J, Section III.A.5.(b) acceptance criteria for Type A tests with respect to determining the frequency of subsequent Type A tests.

Consistent with the proposed partial exemptions from 10CFR50 Appendix J, IP is requesting changes to paragraph 2.D of the operating license for CPS (NPF-62) to reflect approval of these partial exemptions. These changes are being proposed in accordance with 10CFR50.90 and are reflected in Attachment 3.

IP also requests the following changes to CPS TS 3/4.6.1.2, "Primary Containment Leakage." These changes are being proposed in accordance with 10CFR50.90 and are reflected in Attachment 3.

- (1) An editorial change to TS 3.6.1.2 Limiting Condition for Operation (LCO) item "a" to correct its format.

- (2) A change to Surveillance Requirement 4.6.1.2.a to delete the requirement to perform the third Type A test of each 10-year service period during the shutdown for the 10-year plant inservice inspections. This is consistent with proposed partial exemption (2) above.
- (3) A change to Surveillance Requirement 4.6.1.2.b to require the "as-found" Type A test results to be less than or equal to the maximum allowable leakage rate (La). This proposed change would also require the "as-left" overall integrated containment leakage rate to be less than 75 percent of La prior to plant startup. These proposed changes are consistent with proposed partial exemption (3) above.

IP is also providing the attached changes to the CPS IS Bases to provide clarification regarding "as-found" and "as-left" leakage rates and to reflect NRC approval of the proposed partial exemptions to 10CFR50 Appendix J. These Bases changes are also reflected in Attachment 3.

Justification for Proposed Changes

As described above, the proposed changes consist of three partial exemptions from 10CFR50 Appendix J, three proposed changes to TS 3/4.6.1.2, and changes to the CPS TS Bases and the operating license to reflect approval of the partial exemptions. Each of these proposed changes are discussed separately below.

Partial Exemptions from 10CFR50 Appendix J

10CFR50 Appendix J Section III.A.1.(a)

Section III.A.1.(a) of 10CFR50 Appendix J requires that a Type A test be terminated if, during the test, potentially excessive leakage paths are identified which would either interfere with satisfactory completion of the test or which would result in the Type A test not meeting the applicable acceptance criteria. The periodic Type A tests performed at CPS are conducted at the calculated peak containment internal pressure of 9.7 psig (Pa), and the applicable acceptance criterion is contained in Section III.A.5.(b)(2) of Appendix J. This criterion states that the measured leakage rate (Lm) at Pa shall be less than 75 percent of the maximum allowable leakage rate (La). (These various terms are defined in Section II of Appendix J.)

Section III.A.1.(a) further requires that, after terminating a Type A test due to potentially excessive leakage, the leakage through the potentially excessive leakage paths be measured using local leakage rate testing (LLRT) methods and repairs and/or adjustments to the affected equipment be made. A Type A test shall then be conducted (i.e., reconducted).

IP proposes that, when excessive leakage is found during a Type A test, the test not be terminated. Instead, the significant leaks will be identified and isolated and the Type A test continued. After completion

of the modified Type A test (i.e., a Type A test with the significant leakage paths isolated), local leakage rates of those paths isolated during the test will be measured before and after necessary repairs and/or adjustments are made to those paths.

Pursuant to the above change, IP proposes that an "as-found" leakage rate for the Type A test be determined by adding the "minimum pathway" local leakage rates measured before any repairs and/or adjustments are made to the leakage paths isolated during the test, to the containment integrated leakage rate measured in the modified Type A test. This adjusted "as-found" leakage rate is to be used in determining the success or failure of the test and hence the scheduling of subsequent Type A tests in accordance with Section III.A.6 of Appendix J.

Finally, and as part of the above change, IP proposes that the acceptability of the overall containment integrated leakage rate be determined by calculating an "as-left" containment overall integrated leakage rate and comparing this to the acceptance criterion of Section III.A.5.(b)(2) of 10CFR50 Appendix J (which requires L_a to be less than 75 percent of L_a). The "as-left" containment overall integrated leakage rate is determined by adding the "minimum pathway" local leakage rates measured after any repairs and/or adjustments are made to the leakage paths isolated during the test, to the containment integrated leakage rate measured in the modified Type A test.

The only differences between this proposal and the requirements in Section III.A.1.(a) of Appendix J are that: (1) the potentially excessive leakage paths will be repaired and/or adjusted after completion of the Type A test rather than before the test; and (2) the Type A test leakage rate is partially determined by calculation rather than by direct measurement. With respect to this latter issue, the limiting value of the overall containment integrated leakage rate in TS 3.6.1.2 LCO item "a" is 0.65 percent by weight of the containment air over a 24-hour period measured at an internal containment pressure of 9.0 psig. The measured "as-left" local leakage rates through the paths isolated during the modified Type A test will normally be a small fraction of this limit. As a result, the values of these "as-left" local leakage rates will normally represent a relatively small correction to the overall containment integrated leakage rate determined by the modified Type A test. Accordingly, there will be very little difference between a calculated "as-left" primary containment leakage rate (i.e., a modified Type A test) and one which would be directly measured in strict compliance with the requirements of Section III.A.1.(a). With respect to the issue of making repairs and/or adjustments to potentially excessive leakage paths during a Type A test rather than after aborting (but before repeating) the test, there is no significant difference in the end result since "as-left" local leakage rates will be required to be within an acceptable limit.

The above proposed partial exemption does not pose any undue risk to public health and safety in that IP will continue to demonstrate that the overall containment integrated leakage rate is less than the value currently specified in the CPS TS prior to plant restart, thus ensuring continued leakage integrity of the containment in accordance with the

intent of 10CFR50 Appendix J. Accordingly, the proposed modified Type A test procedure achieves the underlying purpose of the rule, thereby demonstrating that one of the special circumstances described in 10CFR50.12(a)(2)(ii) applies. In addition, this exemption is similar to a request which has previously been approved for Carolina Power and Light Company's H. B. Robinson plant and a request previously approved for Union Electric's Callaway plant.

This exemption request requires no corresponding proposed change to the CPS TS (other than the acknowledgement of the exemption in the CPS operating license and CPS TS Bases).

10CFR50 Appendix J Section III.D.1.(a)

Section III.D.1.(a) of 10CFR50 Appendix J requires, in part, "...a set of three Type A tests shall be performed at approximately equal intervals during each 10-year service period. The third test of each set shall be conducted when the plant is shut down for the 10-year plant inservice inspection." IP proposes to perform the three Type A tests at approximately equal intervals within each 10-year period, with the third test of each set conducted as close as practical to the end of the 10-year period. However, there would be no required connection between the Appendix J 10-year interval and the inservice inspection 10-year interval.

The 10-year plant inservice inspection (ISI) is the series of inspections performed every 10 years in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10CFR50.55a. IP performs the ISI volumetric, surface and visual examinations of components and system pressure tests in accordance with 10CFR50.55a(g)(4) throughout the 10-year inspection interval. The major portion of this effort is presently being performed every 18 months during the refueling outages. As a result, there is no extended outage in which the 10-year ISI examinations are performed.

Each of these two surveillance tests (i.e., the Type A tests and the 10-year ISI program) is independent of the other and provides assurances of different plant characteristics. The Type A test assures the required leak-tightness to demonstrate compliance with the guidelines of 10CFR Part 100. The 10-year ISI program provides assurance of the integrity of the structures, systems, and components as well as verifying operational readiness of pumps and valves in compliance with 10CFR50.55a. There is no benefit to be gained by coupling these requirements to the same refueling outage in that elements of the CPS ISI program are conducted throughout each 10-year cycle rather than during a refueling outage at the end of the 10-year cycle. Consequently, the subject coupling requirement offers no benefit either to safety or to economical operation of the facility. Accordingly, the subject exemption request meets the underlying purpose of the rule [10CFR50.12(a)(2)(ii)].

Consistent with this exemption request, a proposed change to CPS TS Surveillance Requirement 4.6.1.2.a is also being requested, as described later in this submittal.

10CFR50 Appendix J Section III.A.5.(b)

Section III.A.5.(b)(2) of 10CFR50 Appendix J establishes an acceptance criterion for the total containment integrated leakage rate (L_{am}) measured at the peak containment internal pressure (P_a) calculated for the design basis accident. Since the periodic Type A tests at CPS are conducted at P_a , the acceptance criterion for these tests is that L_{am} be less than 75 percent of the maximum allowable leakage rate L_a . This value is 0.65 percent by weight of the containment air per 24 hours, as specified in TS 3.6.1.2.a.

Consistent with the previously described request regarding Section III.A.1.(a) of 10CFR50 Appendix J, IP proposes to establish two conditions for determining the acceptability of the periodic Type A tests. These two conditions are the "as-found" leakage rate and the "as-left" leakage rate. The "as-found" leakage rate is calculated by adding the differences between the "as-found" and "as-left" measured local leakage rates for each Type B and Type C test performed prior to the Type A test to the leakage rate measured during the Type A test. [However, these Type B and C tests may be performed after the Type A test in those cases when venting of the associated system is not required per Section III.A.1.(d) of 10CFR50 Appendix J.] In addition, in the event that potentially excessive leakage paths are identified which would interfere with the satisfactory completion of the periodic Type A test, such paths will be isolated during the test (as described previously), the Type B or Type C "as-found" leakage rate for the isolated penetrations will be measured after completion of the Type A test and added to the leakage measured during the modified Type A test. The "as-left" leakage rate is calculated by adding the local leakage rates measured after any required repairs and/or adjustments are made to those leakage paths isolated during the test, to the containment integrated leakage rate measured in the modified Type A test.

The specific proposal for the revised acceptance criteria in lieu of the present single criterion in 10CFR50 Appendix J Section III.A.5.(b)(2) (i.e., L_{am} less than $0.75 L_a$) is that the "as-found" allowable leakage rate must be within L_a and the "as-left" allowable leakage rate must be less than $0.75 L_a$.

The basis for this proposal is that the acceptance criterion for L_{am} was established in Appendix J as $0.75 L_a$ in order to provide a margin of 25 percent (i.e., $0.25 L_a$) to account for possible deterioration of the reactor primary containment leak-tightness during the time between the periodic Type A tests. The value of L_a is the actual leakage rate assumed in the accident analyses in Chapter 12 of the USAR. (Refer to Table 15.6.5-5 of the CPS USAR.) There is no need for the 25 percent margin to account for deterioration at the end of a Type A test interval since the "as-found" leakage corresponds to the actual condition of the containment at the end of the test interval.

The proposal for the acceptance criterion for the "as-found" maximum allowable leakage rate of L_a is acceptable on the basis that, throughout the prior Type A test interval, the reactor primary containment leakage would have been at or below the value currently required in the CPS TS

and within the value assumed in the accident analyses in the CPS USAR. Furthermore, the proposal continues to maintain the requirement that the reactor primary containment (i.e., the "as-left" condition) leakage rate be re-established to less than 0.75 La prior to restart of the plant.

There is added assurance that there will not be any significant undetected degradation in the reactor primary containment leakage during each Type A test interval in that the primary contributors to potentially excessive leakage paths will be measured during the required periodic Type B and Type C tests. These latter tests will be conducted at intervals no greater than 2 years. (See Sections III.D.2 and III.D.3 of Appendix J and Surveillance Requirement 4.6.1.2.d.) The principal contributors to any deterioration in the containment leakage rate would thereby be detected and corrected at least once between performances of Type A tests.

The proposed exemption request does not pose any undue risk to public health and safety in that IP will continue to demonstrate the containment overall integrated leak rate will be less than the value currently specified in the CPS TS and 10CFR50 Appendix J prior to restart after a refueling outage using the present acceptance criterion of 0.75 La. Further, any potentially excessive leakage paths will continue to be repaired and/or adjusted prior to restart and at intervals no greater than 2 years, thereby continuing to ensure the integrity of the containment in accordance with the intent described in 10CFR50 Appendix J. Based on these considerations, the proposed alternative acceptance criteria for the leak-tightness of the reactor primary containment will continue to ensure its integrity with respect to compliance with the maximum permissible containment leakage rate specified in the CPS USAR. Accordingly, the proposed modified Type A test acceptance criteria achieves the underlying purpose of the rule, thereby demonstrating that one of the special circumstances described in 10CFR50.12(a)(2)(ii) applies.

Consistent with this exemption request, a proposed change to CPS is 4.6.1.2.b is also requested, as described below.

Proposed Changes to TS 3/4.6.1.2

The proposed changes to CPS TS 3/4.6.1.2 consist of an editorial change to LCO item "a", a change to Surveillance Requirement 4.6.1.2.a to delete the requirement to perform the third Type A test of each 10-year service period during the shutdown for the 10-year plant inservice inspection, and a change to Surveillance Requirement 4.6.1.2.b to require the "as-found" Type A test results to be within La and require the "as-left" overall integrated containment leakage rate to be less than 0.75 La prior to plant startup. Each of these changes is discussed separately below.

TS 3.6.1.2 Item "a"

This change is editorial. The LCO item is currently formatted to allow subitems. However, only one subitem is included. As a result, the

current format can create confusion. This change merely deletes the colon and "1.". Therefore, there is no change to the technical requirements of this LCO item.

1S 4.6.1.2.a

The proposed changes to this surveillance requirement are provided to be consistent with the partial exemption from 10CFR50 Appendix J Section III.A.1.(a) described previously. As already noted, there is no benefit in coupling the requirements of the 10-year ISI program with those for performing Type A leakage rate tests. Each of these two surveillances (i.e., the Type A tests and the 10-year ISI program) is independent of the other and provides assurances of different plant characteristics. The Type A tests assure the required leak-tightness for the reactor primary containment to demonstrate compliance with the guidelines of 10CFR Part 100. The 10-year ISI program provides assurance of integrity of the plant's structures, systems, and components as well as verifying operational readiness of pumps and valves in compliance with 10CFR50.55a. There is no safety-related concern necessitating their coupling to the same refueling outage. As a result, IP is proposing to delete this unnecessarily restrictive requirement from this surveillance requirement.

1S 4.6.1.2.b

The proposed changes to this surveillance requirement are provided to be consistent with the requested partial exemption from 10CFR50 Appendix J Section III.A.5.(b) discussed previously. Accordingly, IP proposes that this surveillance requirement for the Type A tests be clarified and made more specific by establishing an "as-found" condition and an "as-left" condition, each with its own acceptance criteria. IP is proposing to utilize two acceptance criteria in lieu of the present single criterion of 10CFR50 Appendix J Section III.A.5.(b) cited above (i.e., Less than 0.75 La). The two criteria proposed are that the "as-found" allowable leakage rate must be within La and the "as-left" allowable leakage rate must be less than 0.75 La.

IP proposes that the "as-found" Type A test result be the leakage rate calculated by adding the differences between the "as-found" and "as-left" measured local leakage rates from each Type B and Type C test performed prior to the Type A test to the leakage rate measured during the Type A test. These Type B and Type C tests are usually conducted prior to conducting the Type A test. (However, these Type B and C tests may be performed after the Type A test in those cases when venting of the associated system is not required per Section III.A.1.(d) of 10CFR50 Appendix J.) In addition, in the event that potentially excessive leakage paths are identified which would interfere with the satisfactory completion of the periodic Type A test, such paths would be isolated (as discussed previously), the Type B or Type C "as-found" leakage rates would be determined for the isolated penetrations after completion of the Type A test and added to the overall integrated leakage rate measured during the modified Type A test. The "as-left" condition is calculated by adding the local leakage rates measured after any required

repairs and/or adjustments are made to those leakage paths isolated during the test, to the containment integrated leakage rate measured in the modified Type A test.

The acceptance criterion for Lam was established in Appendix J as $0.75 L_a$ in order to provide a margin of 25 percent (i.e., $0.25 L_a$) to account for possible deterioration of the reactor primary containment leak-tightness during the time between periodic Type A tests. The value of L_a is the leakage rate assumed in the accident analyses in Chapter 15 of the USAR. (Refer to Table 15.6.5-5 of the CPS USAR.) There is no need for the 25 percent margin to account for deterioration at the end of a Type A test interval since the "as-found" leakage corresponds to the actual condition of the containment at the end of the test interval.

There is added assurance that there will not be any significant undetected degradation in the reactor primary containment leakage during each Type A test interval in that the primary contributors to potentially excessive leakage paths will be measured during the required periodic Type B and Type C tests. These latter tests will be conducted at intervals no greater than 2 years. (Refer to Section III.D.2 and III.D.3 of Appendix J and Surveillance Requirement 4.6.1.2.d.) The principal contributors to any deterioration in the containment leakage rate would thereby be detected and corrected at least once between Type A tests. The air locks will also continue to be tested at intervals of 6 months.

On the above basis, the acceptance criteria for determining the frequency of the next Type A test should be based on the "as-found" Type A test results. Ensuring that the "as-found" leakage is less than L_a verifies that the containment has performed acceptably since the last Type A test and that the current surveillance frequency is adequate. In addition, a requirement has been added to ensure that the required $0.25 L_a$ margin to account for degradation has been restored prior to plant restart.

Changes to the CPS TS Bases

Proposed changes to the CPS Bases have also been included in Attachment 3. The changes would reflect that CPS has been granted the partial exemptions from 10CFR50 Appendix J proposed above. In addition, the changes would identify how "as-found" and "as-left" overall integrated leakage rates are determined. These proposed changes are consistent with the proposed partial exemptions and the proposed changes to TS 3/4.6.1.2 described above.

Changes to the Operating License

In addition to changes to the Bases for TS 3/4.6.1.2, AP is requesting changes to Operating License NPF-62 paragraph 2.D to reflect NRC approval of the partial exemptions to 10CFR50 Appendix J proposed above. These changes merely document NRC approval of the proposed exemptions and identify the location where the special circumstance regarding these exemptions are identified. This change does not result in any technical changes to plant operation requirements other than those previously discussed above.

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 changes are evaluated against each of these criteria below.

- (1) These proposed operating license and TS changes consist of editorial and technical changes. The editorial changes merely reflect approval of partial exemptions from 10CFR50 Appendix J and make an editorial format change. The technical changes involve deletion of the requirement to perform the third Type A test for each 10-year service period during the shutdown for the 10-year plant inservice inspections and a change to base the frequency of subsequent Type A tests on an "as-found" leakage limit of L_a and require the "as-left" overall containment integrated leakage rate to be less than $0.75 L_a$ prior to plant restart. These two technical changes only involve containment leak rate testing requirements and are based on partial exemptions from Appendix J to 10CFR50. Because these changes only involve leak rate testing, they cannot increase the probability of any accident previously evaluated.

With respect to elimination of the requirement to perform the third Type A test for each 10-year service period during the shutdown for the 10-year plant inservice inspections, there is no significant benefit in coupling these two surveillances. Each of these two surveillances (i.e., the Type A tests and the 10-year ISI program) is independent of the other and provides assurances of different plant characteristics. The Type A tests assure the required leak-tightness for the reactor primary containment to demonstrate compliance with the guidelines of 10CFR Part 100. The 10-year ISI program provides assurance of the integrity of the plant's structures, systems, and components as well as verifying operational readiness of pumps and valves in compliance with 10CFR50.55a. There is no safety-related concern necessitating their coupling to the same refueling outage. As a result, this change cannot increase the consequences (i.e., offsite dose) of any accident previously evaluated.

With respect to the change to the basis for determining the frequency for performing subsequent Type A tests, this change does not increase the consequences of any accident previously evaluated. The acceptance criterion for L_m was established in Appendix J as $0.75 L_a$ in order to provide a margin of 25 percent (i.e., $0.25 L_a$) to account for possible deterioration of the reactor primary containment leak-tightness between the periodic Type A tests. The value of L_a is the leakage rate assumed in the accident analyses in Chapter 15 of the USAR. (Refer to Table 15.6.5-5 of the CPS USAR.) Per these analyses, offsite doses resulting from a design-basis loss-of-coolant accident were calculated to be 4.4 Rem whole body and 163 Rem inhalation at the Exclusion Area boundary and 1.7 Rem whole body and 156 Rem inhalation at the Low Population Zone boundary. (Refer to Table 15.6.5-6 of the CPS USAR.) These calculated

doses are well below the 10CFR100.11 guidelines of 25 Rem whole body and 300 Rem total. In addition, there is no need for the 25-percent margin to account for deterioration at the end of a Type A test interval since the "as-found" leakage corresponds to the actual condition of the containment at the end of the test interval. Moreover, with respect to "as-left" leakage, the 0.75 La acceptance criterion of 10CFR50 Appendix J will continue to be required to be met prior to plant restart.

There is also added assurance that there will not be any significant undetected degradation in the reactor primary containment leakage during each Type A test interval in that the primary contributors to potentially excessive leakage paths will be measured during the required periodic Type B and Type C tests. These latter tests will be conducted at intervals no greater than 2 years. (Refer to Section III.D.2 and III.D.3 of Appendix J and Surveillance Requirement 4.6.1.2.b.) The principal contributors to any deterioration in the containment leakage rate would thereby be detected and corrected at least once between Type A tests. The air locks will also continue to be tested at intervals of 6 months.

Therefore, based on the above, these proposed changes will not increase the probability or the consequences of any accident previously evaluated.

- (2) These proposed changes do not involve any change to the plant design or operation. As discussed above, these changes cannot increase the consequences of any accident previously evaluated. As a result, no new failure modes are created. Therefore, these proposed changes cannot create the possibility of any new or different kind of accident from any accident previously evaluated.
- (3) As previously noted, the proposed changes consist of editorial and technical changes. The editorial changes do not directly involve or impact any margin of safety as they merely acknowledge approval of proposed partial exemptions from 10CFR50 Appendix J and make an editorial format change. The proposed technical changes (to delete the requirement to perform the third Type A test for each 10-year service period during the shutdown for the 10-year plant inservice inspections, to base the frequency of subsequent Type A tests on an "as-found" leakage limit of La and require the "as-left" overall containment integrated leakage rate to be less than 0.75 La prior to plant restart) do not change the acceptance criteria that must be met for inservice inspections, do not relax the "as-left" condition of the containment that must be met prior to plant restart and do not change the requirements that must be met between plant refueling outages. Therefore, these proposed changes do not result in a significant reduction in the margin of safety.

Based upon the foregoing, Illinois Power has concluded that these proposed changes do not involve a significant hazards consideration.