

10 CFR 50.90

RS-10-039  
June 4, 2010

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Clinton Power Station, Unit 1  
Facility Operating License No. NPF-62  
NRC Docket No. 50-461

**Subject:** License Amendment Request to Administratively Revise Technical Specifications

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company, LLC (EGC) is requesting an amendment to Facility Operating License No. NPF-62 for Clinton Power Station, Unit 1 (CPS). The proposed amendment removes a time-related item from the Technical Specifications (TS). The time-related item has expired, is no longer applicable, and no longer needs to be maintained in the TS. Additionally, the proposed amendment provides correction of typographical errors introduced into the TS in previous license amendments.

This request is subdivided as follows:

- Attachment 1 provides an evaluation of the proposed changes.
- Attachment 2 includes TS pages with the proposed changes indicated.
- Attachment 3 includes TS Bases pages with the proposed changes indicated. The TS Bases pages are provided for information only, and do not require NRC approval.

EGC requests approval of the proposed change by June 4, 2011, with the amendment being implemented within 30 days of issuance.

The proposed amendment has been reviewed by the CPS Plant Operations Review Committee and approved by the Nuclear Safety Review Board in accordance with the requirements of the EGC Quality Assurance Program.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," EGC is notifying the State of Illinois of this application for a change to the TS by sending a copy of this letter and its attachments to the designated State Official.

There are no regulatory commitments associated with the changes proposed by this request.

Should you have any questions about this letter, please contact Mr. Mitchel A. Mathews at (630) 657-2819.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on the 4<sup>th</sup> day of June 2010.

Respectfully,

A handwritten signature in black ink, appearing to read "Jeffrey L. Hansen". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Jeffrey L. Hansen  
Manager – Licensing and Regulatory Affairs

- Attachment 1: Evaluation of Proposed Changes
- Attachment 2: Markup of Proposed Technical Specifications Changes
- Attachment 3: Markup of Proposed Technical Specifications Bases Changes (For Information Only)

**ATTACHMENT 1**  
**Evaluation of Proposed Changes**  
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**1.0 DESCRIPTION**

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company, LLC (EGC) is requesting an amendment to Facility Operating License Nos. NPF-62 for Clinton Power Station, Unit 1 (CPS). The proposed amendment removes one time-related item and several typographical errors from the Technical Specifications (TS). The time-related item has expired and no longer needs to be maintained in the TS.

**2.0 PROPOSED CHANGES**

TS 3.0, "SR Applicability"

Correct an administrative issue in TS 3.0, "SR Applicability," Page 3.0-5. The proposed change corrects an editorial issue related to the format of page 3.0-5. The proposed change removes the single line and parenthetical "(continued)" at the bottom of Page 3.0-5, and inserts a double line to indicate the end of the section. This administrative error was introduced into the TS during the implementation of Amendment 163 (Reference 1).

TS 3.3.5.1, "ECCS Instrumentation"

In order to correct an administrative issue in TS 3.3.5.1, "ECCS Instrumentation," EGC is requesting the indentation of the Logical Connector "OR" between TS 3.3.5.1, Required Actions D.2.1 and D.2.2. The indentation of this logical connector will provide clarity regarding compliance with the LCO. Specifically, the referenced channel must be placed in the trip condition within 24 hours, or alternatively, the High Pressure Core Spray pump suction must be aligned to the Suppression Pool within 24 hours. This error was introduced into the CPS TS in Amendment 95 (Reference 2), which converted the CPS TS to the Improved Technical Specifications format.

TS 3.6.5.1, "Drywell"

Revise TS 3.6.5.1, "Drywell," SR 3.6.5.1.3. EGC is requesting deletion of Note 1 from SR 3.6.5.1.3, as the allowance provided by this Note which was added in TS Amendment 160 (Reference 3) has expired. This SR is being met, and no longer needs to be modified by this Note.

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TS 3.6.5.6, "Drywell Post-LOCA Vacuum Relief System"

In order to correct an administrative issue in TS 3.6.5.6, "Drywell Post-LOCA Vacuum Relief System," EGC is requesting the addition of the words "not met" at the end of Condition D. These words were erroneously omitted from the markups of the TS pages that were submitted in the request that led to Amendment 187 (Reference 4).

TS 3.8.4, "DC Sources-Operating"

In order to correct an administrative issue in TS 3.8.4, "DC Sources-Operating," EGC is requesting the insertion of a new TS Page 3.8-24b. An additional TS Page (i.e., Page 3.8-24a) was inserted in the TS during the implementation of TS Amendment 187 (Reference 4). Since the CPS TS are double-sided, an additional blank page should have accompanied Page 3.8-24a during the implementation of Amendment 187. The purpose of the blank page is to maintain the pagination on the pages subsequent to the newly inserted TS page.

**3.0 BACKGROUND**

All the identified issues are the result of the expiration of a time-related requirement or administrative errors that were introduced into the TS during the license amendment request or implementation process. None of these issues is of a technical nature.

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#### **4.0 TECHNICAL ANALYSIS**

All proposed changes are administrative in nature and require no technical analysis.

#### **5.0 REGULATORY ANALYSIS**

##### **5.1 No Significant Hazards Consideration**

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company, LLC (EGC) is requesting an amendment to Facility Operating License No. NPF-62 for Clinton Power Station, Unit 1 (CPS). The proposed amendment provides for the administrative removal of a time-related requirement that has expired and the correction administrative errors from the Technical Specifications (TS). The time-related item is no longer applicable, and therefore, no longer needs to be maintained in the TS.

According to 10 CFR 50.92, "Issuance of amendment," paragraph (c), a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability or consequences of an 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.

In support of this determination, an evaluation of each of the three criteria set forth in 10 CFR 50.92 is provided below regarding the proposed license amendment.

**1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?**

**Response:** No

The initial conditions and methodologies used in the accident analyses remain unchanged. The proposed changes do not change or alter the design assumptions for the systems or components used to mitigate the consequences of an accident. Therefore, accident analyses results are not impacted.

All changes proposed by EGC in this amendment request are administrative in nature, and include the removal a time-related requirement that has been satisfied and the correction of typographical-type administrative errors. There are no physical changes to the facilities, nor any changes to the station operating procedures, limiting conditions for operation, or limiting safety system settings.

Based on the above discussion, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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**2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?**

**Response:** No

None of the proposed changes affect the design or operation of any system, structure, or component in the plant. The safety functions of the related structures, systems, or components are not changed in any manner, nor is the reliability of any structure, system, or component reduced by the revised surveillance or testing requirements. The changes do not affect the manner by which the facility is operated and do not change any facility design feature, structure, system, or component. No new or different type of equipment will be installed. Since there is no change to the facility or operating procedures, and the safety functions and reliability of structures, systems, or components are not affected, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

Based on this evaluation, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

**3. Does the proposed amendment involve a significant reduction in a margin of safety?**

**Response:** No

The proposed changes to the TS are administrative in nature and have no impact on the margin of safety of any of the TS. There is no impact on safety limits or limiting safety system settings. The changes do not affect any plant safety parameters or setpoints.

Based on this evaluation, the proposed changes do not involve a significant reduction in a margin of safety.

Therefore, EGC concludes that the proposed changes do not involve a significant hazards consideration under the criteria set forth in 10 CFR 50.92(c).

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**5.2 Applicable Regulatory Requirements/Criteria**

10 CFR 50.36, "Technical specifications," details the information that must be included in each station's TS. The proposed changes modify a time-related requirement that is no longer applicable and correct errors that are administrative in nature. The proposed changes have no impact on current Safety Limits, Limiting Safety System Settings, Limiting Control Settings, Limiting Conditions for Operation, Surveillance Requirements, Design Features, or Administrative Controls. Therefore, EGC concludes that the methods used to comply with 10 CFR 50.36 are not modified by the proposed changes, and the requirements continue to be met.

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

**6.0 ENVIRONMENTAL CONSIDERATION**

EGC has evaluated this proposed license amendment consistent with the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21, "Criteria for and identification of licensing and regulatory actions requiring environmental assessments." EGC has determined that this proposed change meets the criteria for categorical exclusion set forth in paragraph (c)(9) of 10 CFR 51.22, "Criterion for categorical exclusion; identification of licensing and regulatory actions eligible for categorical exclusion or otherwise not requiring environmental review," and has determined that no irreversible consequences exist in accordance with paragraph (b) of 10 CFR 50.92, "Issuance of amendment." This determination is based on the fact that this change is being processed as an amendment to the license issued pursuant to 10 CFR 50, "Domestic Licensing of Production and Utilization Facilities," which changes a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, "Standards for Protection Against Radiation," or which changes an inspection or surveillance requirement and the amendment meets the following specific criteria:

**(i) The amendment involves no significant hazards consideration.**

As demonstrated in Section 5.1 above, "No Significant Hazards Consideration," the proposed change does not involve any significant hazards consideration.

**(ii) There is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite.**

The proposed changes will delete an expired time-related requirement and correct administrative errors in the Clinton Power Station Technical Specifications (TS).

These proposed changes will not result in an increase in power level, nor will the proposed changes increase the production or alter the flow path or method of disposal of radioactive waste or byproducts; therefore, there will be no change in the amounts of radiological effluents released offsite.



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**7.0 REFERENCES**

1. Letter from K. R. Jury (AmerGen Energy Company, LLC (AmerGen)) to U. S. NRC, "Request for Amendment to Technical Specifications Regarding Mode Change Limitations Using the Consolidated Line Item Improvement Process," dated April 30, 2004
2. Letter from J. S. Perry (Illinois Power) to U. S. NRC, "Clinton Power Station Proposed Amendment of Facility Operating License No. NPF-62," dated October 26, 1993
3. Letter from K. R. Jury (AmerGen) to U. S. NRC, "Request for Amendment to Technical Specifications 3.6.5.1, 'Drywell' and 5.5.13, 'Primary Containment Leakage Rate Testing Program,'" dated January 29, 2003
4. Letter from J. L. Hansen (EGC) to U. S. NRC, "Additional Information Supporting Requests for License Amendments to Adopt TSTF-423, 'Technical Specifications End States, NEDC-32988-A,'" dated January 30, 2009

## ATTACHMENT 2

### Markup of Proposed Technical Specifications Changes

Clinton Power Station, Unit 1

Facility Operating License No. NPF-62

License Amendment Request to Administratively Revise Technical Specifications

#### Technical Specifications Pages

3.0-5  
3.3-34  
3.6-54b  
3.6-69  
3.8-24b

3.0 SR APPLICABILITY (continued)

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SR 3.0.3 (continued) When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

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SR 3.0.4 Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4. This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

(continued)

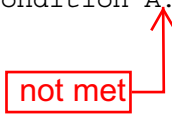


SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.6.5.1.3 Verify bypass leakage is less than or equal to the bypass leakage limit. However, during the first unit startup following bypass leakage testing performed in accordance with this SR, the acceptance criterion is <math>\leq 10\%</math> of the drywell bypass leakage limit.</p>	<p>24 months following 2 consecutive tests with bypass leakage greater than the bypass leakage limit until 2 consecutive tests are less than or equal to the bypass leakage limit</p> <p><u>AND</u></p> <p>48 months following a test with bypass leakage greater than the bypass leakage limit</p> <p><u>AND</u></p> <p>-----NOTES-----  <del>1. The next required performance of this SR may be delayed to November 23, 2008.</del>  <del>2. SR 3.0.2 is not applicable for extensions &gt; 12 months.</del>            -----</p> <p>120 months</p>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Two or more drywell post-LOCA vacuum relief subsystems inoperable for reasons other than Condition A.	C.1 Restore drywell post-LOCA vacuum relief subsystems to OPERABLE status.	72 hours
D. Required Action and associated Completion Time of Condition A.  <div style="border: 1px solid red; padding: 2px; display: inline-block;">not met</div> 	D.1 Be in MODE 3.  <u>AND</u>  D.2 Be in MODE 4.	12 hours    36 hours
E. Required Action and associated Completion Time of Condition B or C not met.	-----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 3. -----  E.1 Be in MODE 3.	      12 hours

Insert new page 3.8-24b.

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**ATTACHMENT 3**

**Markup of Proposed Technical Specifications Bases Changes (For Information Only)**

Clinton Power Station, Unit 1

Facility Operating License No. NPF-62

License Amendment Request to Administratively Revise Technical Specifications

Technical Specifications Bases Pages

B 3.6-105a



BASES

SURVEILLANCE  
REQUIREMENTS

SR 3.6.5.1.3

The analyses in Reference 1 are based on a maximum drywell bypass leakage. This Surveillance ensures that the actual drywell bypass leakage is less than or equal to the acceptable  $A/\sqrt{k}$  design value of 1.0 ft<sup>2</sup> assumed in the safety analysis. As left drywell bypass leakage, prior to the first startup after performing a required drywell bypass leakage test, is required to be  $\leq 10\%$  of the drywell bypass leakage limit. At all other times between required drywell leakage rate tests, the acceptance criteria is based on the design  $A/\sqrt{k}$ . At the design  $A/\sqrt{k}$  the containment temperature and pressurization response are bounded by the assumptions of the safety analysis. One drywell air lock door is left open during each drywell bypass leakage test such that each drywell air lock door is leak tested during at least every other drywell bypass leakage test. This ensures that the leakage through the drywell air lock is properly accounted for in the measured bypass leakage and that each air lock door is tested periodically.

This Surveillance is performed at least once every 10 years (120 months) on a performance based frequency. The Frequency is consistent with the difficulty of performing the test, risk of high radiation exposure, and the remote possibility that sufficient component failures will occur such that the drywell bypass leakage limit will be exceeded. ~~This Frequency is modified by a note that allows for a one-time deferral of this surveillance until November 23, 2008.~~ If during the performance of this required Surveillance the drywell bypass leakage is determined to be greater than the leakage limit, the Surveillance Frequency is increased to at least once every 48 months. If during the performance of the subsequent consecutive Surveillance the drywell bypass leakage is determined to be less than or equal to the drywell bypass leakage limit, the 10-year Frequency may be resumed. If during the performance of the subsequent consecutive Surveillance the drywell bypass leakage is determined to be greater than the drywell bypass leakage limit, the Surveillance Frequency is increased to at least once every 24 months. The 24-month Frequency must be maintained until the drywell bypass leakage is determined to

(continued)