



Clinton Power Station  
8401 Power Road  
Clinton, IL 61727

U-604298  
July 15, 2016

10CFR50.73  
SRRS 5A.108

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

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

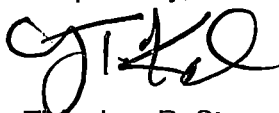
Subject: Licensee Event Report 2016-008-00

Enclosed is Licensee Event Report (LER) 2016-008-00: Implementation of Enforcement Guidance Memorandum (EGM) 11-003, Revision 3. This report is being submitted in accordance with the requirements of 10 CFR 50.73.

There are no regulatory commitments contained in this report.

Should you have any questions concerning this report, please contact Mr. Dale Shelton, Regulatory Assurance Manager, at (217) 937-2800.

Respectfully,

 FOR TED STONER

Theodore R. Stoner  
Site Vice President  
Clinton Power Station

KP/bsz

Attachment: Licensee Event Report 2016-008-00

cc:

Regional Administrator— NRC Region III  
NRC Senior Resident Inspector - Clinton Power Station  
Office of Nuclear Facility Safety — Illinois Emergency Management Agency

IE 22  
NRR



**LICENSEE EVENT REPORT (LER)**  
(See Page 2 for required number of digits/characters for each block)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

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**4. TITLE**  
Implementation of Enforcement Guidance Memorandum (EGM) 11-003, Revision 3

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
05	18	2016	2016	008	00	07	15	2016		05000
									FACILITY NAME	DOCKET NUMBER
										05000

**9. OPERATING MODE**      **11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)**

5	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)
	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)
10. POWER LEVEL  000	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> 73.77(a)(1)
	<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	<input type="checkbox"/> 73.77(a)(2)(i)
	<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> 73.77(a)(2)(ii)
		<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> OTHER	Specify in Abstract below or in NRC Form 366A

**12. LICENSEE CONTACT FOR THIS LER**

LICENSEE CONTACT Dale A. Shelton, Regulatory Assurance Manager	TELEPHONE NUMBER (Include Area Code) 217-937-2800
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**13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT**

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

**14. SUPPLEMENTAL REPORT EXPECTED**      **15. EXPECTED SUBMISSION DATE**

YES (If yes, complete 15. EXPECTED SUBMISSION DATE)       NO

MONTH	DAY	YEAR

**ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)**

The condition reported by this LER is the result of planned activities in support of Refueling Outage C1R16 at Clinton Power Station (CPS). As described in the LER, the NRC provided enforcement guidance, applicable to boiling water reactor licensees, that addresses the reported condition. Although this allowance is provided by the NRC's enforcement guidance, the planned activities are still considered reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications (TS). On May 18, 2016 and May 23, 2016, CPS performed Operations with the Potential for Draining the Reactor Vessel (OPDRV) activities while in Mode 5 without an operable Secondary Containment. These activities were performed within the guidelines of NRC Enforcement Guidance Memorandum (EGM) 11-003, Revision 3 which allows the implementation of interim actions as an alternative to full compliance, provided several conditions are met. The OPDRV activities were planned activities that were completed following the guidance of the EGM and are considered to have low safety significance based on interim actions taken. Since these actions were preplanned, no cause determination was necessary. As required by the EGM, a license amendment request will be submitted following NRC approval of the Technical Specifications Task Force traveler associated with generic resolution of this issue.



**LICENSEE EVENT REPORT (LER)  
CONTINUATION SHEET**

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to [Infocollects.Resource@nrc.gov](mailto:Infocollects.Resource@nrc.gov), and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

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**NARRATIVE**

**PLANT AND SYSTEM IDENTIFICATION**

General Electric—Boiling Water Reactor, 3473 Megawatts Thermal Rated Core Power Energy Industry Identification System (EIS) codes are identified in the text as [XX]

**EVENT IDENTIFICATION**

Implementation of Enforcement Guidance Memorandum (EGM) 11-003, Revision 3

**A. Plant Operating Conditions before the Event**

Unit: 1                      Event Date: May 18, 2016                      Event Time: 0100  
Mode: 5                      Mode Name: Refueling                      Reactor Power: 00 percent

**B. DESCRIPTION OF EVENT**

While in Mode 5, Refueling, Operations with the Potential for Draining the Reactor Vessel (OPDRV) were performed as part of the Unit 1 C1R16 Refueling Outage without an operable Secondary Containment (SC). The event timeline is presented as follows:

May 18, 2016 at 0100 - Commenced OPDRV activities under the provisions of EGM 11-003, Rev 3 for shifting residual heat removal (RHR) B to the upper pools.

May 18, 2016 at 0106 - Completed OPDRV activities.

May 23, 2016 at 2010 - Commenced OPDRV activities under the provisions of EGM 11-003, Rev. 3 for shifting RHR B from the upper pools to the feedwater lines.

May 23, 2016 at 2015 - Completed OPDRV activities.

OPDRV activities were completed successfully in support of the completion of Refueling Outage C1R16.

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**NARRATIVE**

**C. CAUSE OF EVENT**

Implementation of EGM 11-003, Revision 3 interim actions during C1R16 Refueling Outage was a preplanned activity. As such, no cause determination was performed for the events.

**D. SAFETY ANALYSIS**

There were no safety consequences associated with the condition described in this report. This event is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as an operation prohibited by CPS Technical Specification 3.6.4.1, Secondary Containment (SC), which prohibits performing activities identified as OPDRVs in Mode 5 with SC inoperable.

The OPDRV activities described in this report were accomplished using the interim actions provided by the NRC in EGM 11-003, Revision 3. CPS adhered to the NRC plain language meaning of OPDRV activities that could potentially result in draining or siphoning the Reactor Pressure Vessel (RPV) water level below the top of the fuel. This included evolutions involving aligning and realigning plant systems prior to achieving steady-state water level control, without taking credit for mitigating measures. CPS also met the requirements which specify the minimum makeup flow rate and water inventory. Further, an adequate defense in depth was maintained to minimize the potential for the release of fission products with SC inoperable. Since these measures were implemented, an adequate level of safety was provided during the performance of the OPDRV activities described in this report.

**E. CORRECTIVE ACTIONS**

CPS will submit a license amendment request following the NRC approval of a Technical Specification Task Force (TSTF) traveler associated with generic resolution of this issue within the time constraints specified in EGM 11-003, Revision 3.

**F. PREVIOUS SIMILAR OCCURENCES**

LER 2013-006-00: Implementation of Enforcement Guidance Memorandum (EGM) 11-03, Revision 1

Between October 13, 2013 and October 27, 2013, CPS performed OPDRV activities while in Mode 5 without an operable SC, as expected and allowed by NRC EGM 11-003, Revision 1. This was a reportable as a condition prohibited by TS as SC was inoperable during OPDRV activities. These activities were concluded successfully during Refueling Outage C1R14 with no resulting safety consequences.

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**NARRATIVE**

LER 2015-002: Implementation of Enforcement Guidance Memorandum (EGM) 11-03, Revision 2.

Between April 29, 2015, and May 12, 2015, CPS performed OPDRV activities while in Mode 5 without an operable SC, as expected and allowed by NRC EGM 11-003, Revision 2. This a condition prohibited by TS 3.6.4.1 and is reportable under 10 CFR 50.73 (a)(2)(i)(B). These activities were completed successfully during Refueling Outage C1R15.

**G. COMPONENT FAILURE DATA**

There was no component failure associated with this event.