

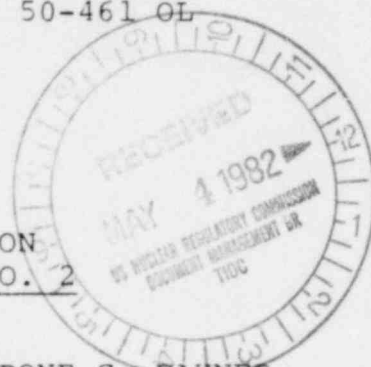
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF ILLINOIS)
POWER COMPANY, SOYLAND POWER)
COOPERATIVE, INC., and)
WESTERN ILLINOIS POWER CO-)
OPERATIVE, INC.)
(Operating License for Clinton)
Power Station, Unit 1))

Docket No. 50-461 OL

MOTION TO ALLOW DISCOVERY ON
PRAIRIE ALLIANCE CONTENTION NO. 2



The State of Illinois (Illinois) by TYRONE C. FAHNER, Attorney General of the State of Illinois, pursuant to Section 2.730 of the NRC Rules of Practice & Procedure, hereby moves the presiding officer to allow discovery in this proceeding on events relating to Prairie Alliance (PA) Contention No. 2 that either have been reported or have occurred since November 11, 1981, the date for filing second round discovery requests. The reasons for this motion are as follows:

1. Further discovery is necessary for a proper decision on PA Contention No. 2. Without extended discovery on this contention Illinois will not be able to adequately ascertain facts, refine its position, and prepare for hearing. PA Contention No. 2 concerns various problems with the Quality Assurance (QA)/Quality Control (QC) program at the Clinton plant. Pursuant

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to the discovery schedule ordered by the Board, Illinois has propounded interrogatories and requested documents on some of these. It has not, however, pursued discovery on activities that either were reported or have occurred since November 11, 1981, which is the cut-off date for second round discovery requests. Since November 11, 1981 additional problems with the Clinton plant QA/QC plan have been uncovered. Some have been reported by the NRC. Exhibits 1-3, which are attached and incorporated by reference, provide some examples of QA/QC problems, documented by the NRC in Inspection & Enforcement (I&E) Reports, that have occurred since November 11, 1981. Others have not yet been reported. For example, I&E Report No. 81-15, which apparently details a June 1981 investigation by the NRC of over twenty-two alleged QA/QC violations, is not yet available to the public because it is still under NRC interval review, almost a year after the investigation began. And, since January 19, 1982 the Applicants have stopped indefinitely all construction work on electrical cable trays at the Clinton plant. Little information is publicly available on the reasons for this "stop work" order, although it presumably has some relation to the QA/QC program at the Clinton plant. These reported and unreported QA/QC problems add to the factual bases to PA Contention No. 2. Illinois should not be foreclosed from pursuing relevant discovery on these problems.

2. The second round of discovery on PA Contention No. 2 has been delayed and is incomplete. Illinois did not receive answers to most of its second round discovery requests until several months after the date responses were due. On March 16, 1982 the Applicants answered Illinois' second round interrogatories, pursuant to the Board's oral order of February 16, 1982 granting Illinois' motion to compel. And, on April 13, 1982 the Applicants produced most of the documents identified in those interrogatory answers. In addition to these delays there are several important matters left unresolved from the second round of discovery. On March 31, 1982 Illinois filed another motion to compel the production of certain documents requested in the second round. And, on April 22, 1982 the Applicants filed a motion for a protective order to prevent discovery of certain documents the Applicants refused to produce on April 13, 1982. Thus, the second round of discovery remains incomplete until the issues contained in these motions are settled.

3. To allow discovery on PA Contention No. 2 will in no way prejudice the Applicants' position in this proceeding. This request will not cause a delay in the anticipated fuel load date. On April 15, 1982 the Applicants announced at an Illinois Power Company shareholders' meeting that the fuel load date has been moved to January 1984, more than a year's delay from the most recently estimated date. Furthermore, as stated previously, the

Clinton plant is still subject to an indefinite stop work order, which will certainly further delay completion of construction. The Applicants cannot claim, therefore, that the discovery request in this motion will delay issuance of an operating license for the Clinton plant, when the date for loading fuel has slipped so much.

4. The information that Illinois intends to seek is relevant to PA Contention No. 2. The discovery requests will be based on specific activities brought to light since the close of the second round of discovery. These activities are related to the allegation in Contention No. 2 that incidents reported in NRC I&E Reports raise questions as to the Applicants' "management technical capabilities to operate, backfit, and permanently shut down the [Clinton plant] in compliance with regulatory requirements."

5. The Applicants have asked for a cut-off date of May 3, 1982 for all discovery in these proceedings in their answer to Illinois' supplemental motion to compel. Illinois objects to the Applicants' request for the reasons set forth above.

WHEREFORE, Illinois moves that the Board allow discovery on events related to PA Contention No. 2 that have occurred

or have been reported since November 11, 1981, the date for
filing second round discovery requests.

Respectfully submitted,

TYRONE C. FAHNER
Attorney General
State of Illinois

BY: Philip L. Willman
PHILIP L. WILLMAN
Assistant Attorney General
Environmental Control Division
188 W. Randolph Street - Suite 2315
Chicago, Illinois 60601
(312) 793-2491

OF COUNSEL

REED NEUMAN
Assistant Attorney General
500 South Second Street
Springfield, Illinois 62701

DATED: April 29, 1982.

EXHIBITS

1. Excerpts from I & E Report No. 81-24, dated November 12, 1981.
2. Excerpts from I & E Report No. 81-27, dated November 24, 1981.
3. Excerpts from I & E Report No. 81-25, dated December 9, 1981.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

M. J. Mura

November 12, 1981

Docket No. 50-461

Illinois Power Company
ATTN: Mr. W. C. Gerstner
Executive Vice President
500 South 27th Street
Decatur, IL 62525

Gentlemen:

This refers to the routine safety inspection conducted by Mr. H. H. Livermore of this office on September 1-30, 1981, of activities at the Clinton Power Station, Unit 1, authorized by NRC Construction Permit No. CPPR-137 and to the discussion of our findings with Mr. M. C. Hollon and others of your staff at the conclusion of the inspection, and to the October 27, 1981 telephone conversation between Mr. R. C. Knop of this office with Mr. L. C. Koch of your staff in regard to the inspection findings.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

During this inspection, certain of your activities appeared to be in non-compliance with NRC requirements, as specified in the enclosed Appendix A. A written response, submitted under oath or affirmation is required.

With regard to item No. 1 of Appendix A, we are concerned about the timeliness and effectiveness of your corrective action on this recurring item. In your response we request that you provide the following additional information: (1) a detailed timetable to assure that all installed equipment (i.e. electrical, mechanical, HVAC, etc.) will be inspected/surveyed to verify that nonsafety related installations do not pose a safety concern to safety related installations, (2) a program to assure that timely inspections/surveys are performed as equipment installation progresses, (3) acceptance criteria relating to system interaction for all equipment previously installed, and (4) documentation indicating that each item of safety related equipment has been inspected to verify that nonsafety related equipment will not interfere with safe plant operations during a postulated seismic event. Further, we request that you notify our Senior Resident Inspector of your plans concerning the disposition of discrepancies identified during the performance of this program.

Certain other activities, set forth in Appendix B to this letter, appear to be a deviation from commitments which you have made in previous correspondence with the Commission. Please advise us in writing within twenty-five days of the date of this letter of the corrective action you have taken

Exhibit "1"

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November 12, 1981

or plan to take, showing the estimated date of completion with regard to this deviation.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures and your response to this letter will be placed in the NRC's Public Document Room. If the enclosures contain any information that you or your contractors believe to be exempt from disclosure under 10 CFR 9.5(a)(4), it is necessary that you (a) notify this office by telephone within seven (7) days from the date of this letter of your intention to file a request for withholding; and (b) submit within twenty-five (25) days from the date of this letter a written application to this office to withhold such information. Section 2.790(b)(1) requires that any such application must be accompanied by an affidavit executed by the owner of the information which identifies the document or part sought to be withheld, and which contains a full statement of the reasons which are the bases for the claim that the information should be withheld from public disclosure. This section further requires the statement to address with specificity the considerations listed in 10 CFR 2.790(b)(4). The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified periods noted above, a copy of this letter, the enclosures, and your response to this letter will be placed in the Public Document Room.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

R. L. Spessard
R. L. Spessard, Director
Division of Resident and
Project Inspection

Enclosures:

1. Appendix A, Notice of Violation
2. IE Inspection Report No. 50-461/81-24

cc w/encls:

DMB Document Control Desk (RIDS)
Resident Inspector, RIII
Mary Jo Murray, Office of
Assistant Attorney General
Gary N. Wright, Manager
Nuclear Facility Safety
Randall L. Plant, Prairie
Alliance

Appendix A

NOTICE OF VIOLATION

Illinois Power Company

Docket No. 50-461

As a result of the inspection conducted on September 1-30, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, states: "Activities affecting quality shall be prescribed... and shall be accomplished in accordance with these instructions, procedures, or drawings."

Illinois Power Nuclear Station Engineering Department Procedure 26, Revision 0, of November 5, 1980 states: "This procedure describes the method to be used for periodic surveillances of site construction to identify potential interaction problems between nonsafety-related systems and nuclear safety-related systems. A Systems Interaction Survey Team shall schedule regular monthly tours of selected CPS areas..."

10 CFR 50, Appendix B, Criterion XVI, Corrective Action, states that: "Measures shall be established to assure that conditions adverse to quality, such as...nonconformances are promptly identified and corrected, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition. The identification of the significant condition...shall be...reported to appropriate levels of management."

Contrary to the above, procedures for an interaction analysis program were not implemented, in that, monthly identification tours and design engineering analysis were not being performed. Further, Quality Assurance notified Illinois Power management of failure to implement the program, and prompt corrective action had not been taken.

This is a Severity Level IV violation (Supplement II).

2. 10 CFR 50, Appendix B, Criterion XIII, Handling, Storage and Shipping, states: "Measures shall be established to control the...preservation of material and equipment...to prevent damage or deterioration."

Baldwin Procedure, Storage and Maintenance, BAP 2.4 paragraph 5.1.3a states: "Items stored in-plant shall be suitably protected to minimize the possibility of damage..."

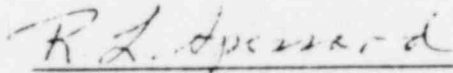
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Contrary to the above, physical protection was not provided for installed Class 1E electrical cable 1 DC03D, thereby resulting in damage from ongoing HVAC construction activity.

This is a Severity Level V violation (Supplement II).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including for each item of noncompliance; (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation. Consideration may be given to extending your response time for good cause shown.

November 12, 1981
Dated



R. L. Spessard, Director
Division of Resident and Project
Inspection

Appendix B

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted during the period September 1-30, 1981, it appears that one of your activities was not conducted in conformance with your commitments to the Commission as indicated below:

The Clinton Final Safety Analysis Report (FSAR), Volume 4, Figure 3.2-1, Classification and Containment Isolation Diagram, Note #9 states: "The RCIC storage tank will be designed, fabricated and tested to meet the intent of ANSI B96.1-73. In addition, the specifications for this tank will require (1) 100 percent surface examination of the side wall to bottom joint and (2) 100 percent volumetric examination of the side wall weld joints, group D classification."

Contrary to the above, only spot radiography (four) in lieu of 100% was performed.

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

NOV 24 1981

Docket No. 50-461

Illinois Power Company
ATTN: Mr. W. C. Gerstner
Executive Vice President
500 South 27th Street
Decatur, IL 62525

RECEIVED
OCT 28 1981
ATTORNEY GENERAL

Gentlemen:

This refers to the routine safety inspection conducted by Messrs. R. N. Gardner and R. L. Lee of this office on October 20-23, 1981, of activities at Clinton Power Station, Unit 1, authorized by NRC Construction Permit No. CPPR-137 and to the discussion of our findings with Messrs. J. O. McHood, W. C. Gerstner and others of your staff at the conclusion of the inspection.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

During this inspection, certain of your activities appeared to be in non-compliance with NRC requirements, as specified in enclosed Appendix A. A written response, submitted under oath or affirmation, is required.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC's Public Document Room. If the enclosures contain any information that you or your contractors believe to be exempt from disclosure under 10 CFR 9.5(a)(4), it is necessary that you (a) notify this office by telephone within seven (7) days from the date of this letter of your intention to file a request for withholding; and (b) submit within twenty-five (25) days from the date of this letter a written application to this office to withhold such information. Section 2.790(b)(1) requires that any such application must be accompanied by an affidavit executed by the owner of the information which identifies the document or part sought to be withheld, and which contains a full statement of the reasons which are the bases for the claim that the information should be withheld from public disclosure. This section further requires the statement to address with specificity the considerations listed in 10 CFR 2.790(b)(4). The

Exhibit "2"

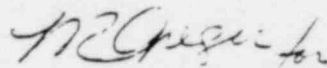
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information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified periods noted above, a copy of this letter, the enclosures, and your response to this letter will be placed in the Public Document Room.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,



C. E. Norelius, Director
Division of Engineering and
Technical Inspection

Enclosures:

1. Appendix A, Notice
of Violation
2. Inspection Report
No. 50-461/81-27

cc w/encls:

DMB/Document Control Desk (RIDS)
Resident Inspector, RIII
Mary Jo Murray, Office of
Assistant Attorney General
Gary N. Wright, Manager,
Nuclear Facility Safety
Randall L. Plant, Prairie
Alliance

Appendix A

NOTICE OF VIOLATION

Illinois Power Company

Docket No. 50-461

As a result of the inspection conducted on October 20-23, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violation was identified:

10 CFR 50 Appendix B, Criterion III, states, in part, "Measures shall be established to assure that applicable regulatory requirements and the design basis, as defined in 50.2 and as specified in the license application...are correctly translated into specifications, drawings, procedures, and instructions."

The Illinois Power Company Quality Assurance Manual, Chapter 3 states in part that, design bases and regulatory requirements shall be adequately translated into the various design documents.

The following instances of failure to correctly translate PSAR requirements into specifications, drawings, procedures, and instructions were identified:

- a. Paragraph 8.3.1.4.2.2.3 of the Clinton Power Station PSAR states in part, "Open raceways assigned to different Divisions shall be separated by at least (a) one foot of horizontal free air space, (b) three feet of vertical free air space, or (c) a fire-resistant barrier with dimensions sufficient to maintain the minimum free air spacing of (a) and (b). This spacing shall apply if both raceways are open." Contrary to this requirement, eight installed Class 1E cable trays were physically separated from non-Class 1E cable trays by less than the required three foot vertical separation. The licensee stated that it was the design intent to install fire protection barriers in accordance with PSAR requirements. The applicable S&L cable tray installation drawings did not specify the use of fire resistant barriers in these instances.
- b. Paragraph 8.3.1.4.4.3.4 of the Clinton Power Station PSAR states in part, "Instrumentation cables shall be installed in separate conduit or in separate nonventilated solid trays with covers to provide electromagnetic shielding." Contrary to this requirement, two installed Class 1E instrumentation cable trays were of the open ladder type. Neither S&L drawings nor other documents specified the use of solid trays.

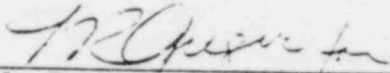
This is a Severity Level VI violation (Supplement II).

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Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation. Consideration may be given to extending your response time for good cause shown.

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Dated



C. E. Norelius, Director
Division of Engineering and
Technical Inspection



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

December 9, 1981

Docket No. 50-461

Illinois Power Company
ATTN: Mr. W. C. Gerstner
Executive Vice President
500 South 27th Street
Decatur, IL 62525

Gentlemen:

This refers to the routine safety inspection conducted by Mr. H. H. Livermore of this office on October 1 through November 9, 1981, of activities at the Clinton Power Station, Unit 1, authorized by NRC Construction Permit No. CPPR-137 and to the discussion of our findings with Mr. M. C. Hollon and others of your staff at the conclusion of the inspection.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

During this inspection, certain of your activities appeared to be in noncompliance with NRC requirements, as specified in enclosed Appendix A. A written response, submitted under oath or affirmation, is required.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC's Public Document Room. If the enclosures contain any information that you or your contractors believe to be exempt from disclosure under 10 CFR 9.5(a)(4), it is necessary that you (a) notify this office by telephone within seven (7) days from the date of this letter of your intention to file a request for withholding; and (b) submit within twenty-five (25) days from the date of this letter a written application to this office to withhold such information. Section 2.790(b)(1) requires that any such application must be accompanied by an affidavit executed by the owner of the information which identifies the document or part sought to be withheld, and which contains a full statement of the reasons which are the bases for the claim that the

Exhibit "3"

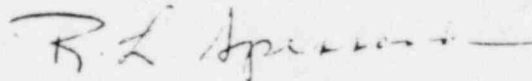
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December 9, 1981

information should be withheld from public disclosure. This section further requires the statement to address with specificity the considerations listed in 10 CFR 2.790(b)(4). The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified periods noted above, a copy of this letter, the enclosures, and your response to this letter will be placed in the Public Document Room.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,



R. L. Spessard, Director
Division of Resident and Project
Inspection

Enclosures:

1. Appendix A, Notice of Violation
2. IE Inspection Report
No. 50-461/81-25

cc w/encls:

DMB Document Control Desk (RIDS)
Resident Inspector, RIII
Mary Jo Murray, Office of
Assistant Attorney General
Gary N. Wright, Manager
Nuclear Facility Safety
Randall L. Plant, Prairie
Alliance

Appendix A

NOTICE OF VIOLATION

Illinois Power Company

Docket No. 50-461

As a result of the inspection conducted on October 1 through November 9, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion XIII, Handling, Storage and Shipping, states: "Measures shall be established to control the...preservation of material and equipment...to prevent damage or deterioration."

Baldwin Procedure, Storage and Maintenance, BAP 2.4, paragraph 5.1.8a states: "Items stored in-plant shall be suitably protected to minimize the possibility of damage, vandalism or misuse."

Contrary to the above, physical and environmental protection from nearby construction activity was not provided for five installed Class 1E Electrical Cabinets and numerous precut, coiled, temporarily stored Class 1E Electrical Cables.

This is a Severity Level V violation (Supplement II).

2. 10 CFR 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, states: "Activities affecting quality shall be prescribed... and shall be accomplished in accordance with these instructions, procedures, or drawings."

Baldwin Procedure, Cable Installation, BAP 3.3.2, Rev. 8, paragraph 5.8.4 states in part: "If the cable has not been correctly installed... the Senior Electrical Quality Control Engineer shall not sign off the Pull Card, but shall note the discrepancies in the Remarks section..."

Baldwin Procedure, Quality Control Inspection Checklist, Form JV 353 states: "Cable is correct color, type and size as specified on Cable Pull Card--Acceptable (A) or Reject (R)."

Contrary to the above, Quality Control Inspectors failed to follow procedures, by accepting twelve incorrectly marked (color coded) Class 1E electrical cables. Inspection checklists and Cable Pull Cards were incorrectly accepted for the installed (pulled) cables.

This is a Severity Level V violation (Supplement II).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice, a written statement or explanation in reply, including for each item of noncompliance; (1) corrective action taken and the results achieved; (2) corrective action

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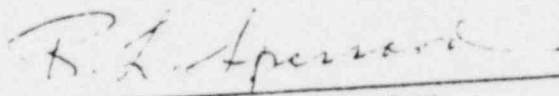
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ppendix A

to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation. Consideration may be given to extending your response time for good cause shown.

December 9, 1981

Dated



R. L. Spessard, Director
Division of Resident and Project
Inspection

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF)	
ILLINOIS POWER COMPANY,)	
SOYLAND POWER COOPERATIVE,)	
INC. and WESTERN ILLINOIS)	Docket No. 50-461 OL
POWER COOPERATIVE, INC.)	
)	
(Operating License for Clinton)	
Power Station, Unit 1))	

N O T I C E

TO: Hugh K. Clark, Esq., Chairman
 P.O. Box 127A
 Kennedyville, Maryland 21645

Dr. George A. Ferguson
School of Engineering
Howard University
2300 Sixth Street, N.W.
Washington, D.C. 20059

Dr. Oscar H. Paris
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Richard J. Goddard
Office of the Executive Legal Director
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Sheldon Zabel
Schiff, Hardin & Waite
7200 Sears Tower
233 South Wacker Drive
Chicago, Illinois 60606

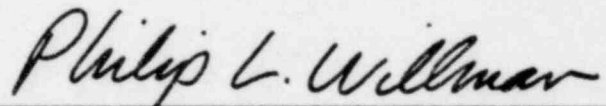
Jan L. Kodner
Tutt and Kodner
173 West Madison Street
Suite 1004
Chicago, Illinois 60602

Prairie Alliance
P.O. Box 2424
Station A
Champaign, Illinois 61820

Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Appeal Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

PLEASE TAKE NOTICE that I have today mailed for filing with the Secretary, United States Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Chief, Docketing and Service Section, one original and two conformed copies of Illinois' Motion To Allow Discovery On Prairie Alliance Contention No. 2. A copy of this document is attached and served upon you.



PHILIP L. WILLMAN
Assistant Attorney General
Environmental Control Division
188 West Randolph Street
Suite 2315
Chicago, Illinois 60601
(312) 793-2491

DATED: April 29, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF)	
ILLINOIS POWER COMPANY,)	
SOYLAND POWER COOPERATIVE,)	
INC. and WESTERN ILLINOIS)	Docket No. 50-461 OL
POWER COOPERATIVE, INC.)	
)	
(Operating License for Clinton)	
Power Station, Unit 1))	

CERTIFICATE OF SERVICE

I hereby certify that I served copies of Illinois' Motion To Allow Discovery On Prairie Alliance Contention No. 2 on the persons listed on the attached Notice by causing same to be deposited in the United States Mail, First Class, postage prepaid, on this 29th day of April, 1982.

Philip L. Willman
PHILIP L. WILLMAN