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ILLINOIS POWER

U-602504
L30-95(10-24)LP
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JGC-448-95
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Docket No. 50-461

Document Control Desk
Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Illinois Power's (IP's) Submittal of a Revised Response to Generic Letter 89-13, "Service Water System Problems Affecting Safety-Related Equipment"

Dear Sir:

By letters dated December 31, 1990, (U-601756) and January 29, 1990, (U-601574), Clinton Power Station (CPS) committed to perform the following: 1) Perform interim chemical treatments of the Shutdown Service Water (SX) system until a permanent design was implemented (letter U-601756). 2) Perform chemical treatment of the Fire Protection (FP) system (letter U-601574). 3) Performance test or inspect each Residual Heat Removal (RHR) heat exchanger (HX) each fuel cycle (letter U-601574). The purpose of this letter is to revise the CPS commitments made in these letters.

1) CPS informed the NRC Site Resident Inspector on February 6, 1995, that quarterly SX chemical treatments had been suspended and replaced by a twice a month SX system flush with periodic inspections of the heat exchangers cooled by the SX system. The interim chemical treatment was accomplished by means of a temporary system and lead to several non-compliances of the station National Pollution Discharge Elimination System (NPDES) permit. The SX system flush method minimizes the development of biofouling by establishing flow for a four hour duration in all three divisions of the SX system (as plant conditions allow). It was also discussed that the flushes would continue through March 1995 at which time it was believed that chemical treatment of the SX system could be resumed. Due to the success of flushing the SX system, CPS has determined that chemical treatment would not resume until permanent modifications are in place. These permanent modifications will provide the flexibility needed in such that chemical treatment may be accomplished as necessary. Work on permanent modifications has started and completion is due during the current or next calendar quarter.

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2) By letter dated January 29, 1990, (U-601574), CPS committed to chemically treat the FP system. Since the original commitment, CPS has decided not to perform direct chemical treatment of the FP system for the following reasons:

- CPS has opened and inspected the FP system at various locations and found material conditions acceptable, and as anticipated.

- Even though FP is not a cooling loop, CPS considers it important to safe shutdown and therefore performs several periodic surveillances such as system flow testing, deluge system testing and fire hydrant flow checks. These tests take water from the FP ring header and would indicate FP system fouling or degradation.

- Makeup water to the FP system has been chemically treated since 1990. Makeup water to the FP system will continue to be chemically treated by the permanent modifications discussed in item one.

- Minor leakage conditions would be indicated by a longer run time or continuous running of the jockey pump which keeps the FP system pressurized.

- Severe degradation would be indicated (annunciated in the control room) by the auto start of the main fire pumps.

If adverse FP system conditions or performance trends are identified by inspections or testing, CPS will determine and take what corrective actions are necessary.

3) RHR HXs "A" and "B" were not performance tested or inspected every fuel cycle as stated in CPS letter dated January 29, 1990, (U-601574). CPS tested RHR "B" HX and inspected RHR "A" HX in the second refueling outage (RF-2), which started in October 1990. Listed below is when each RHR HX was subsequently tested:

Date	RHR HX
May 1992	RHR "A" HX
March 1993	RHR "B" HX
January 1995	RHR "A" HX

These performance tests did not indicate degraded conditions or performance parameters with the heat exchangers. However, CPS has reevaluated the performance testing methods for the RHR HXs. This reevaluation determined that

annual RHR HX performance testing could be accomplished. The annual tests are scheduled to begin December 1995 for RHR "A" HX and February 1996 for RHR "B" HX.

Conclusions:

CPS will ensure that systems which utilize raw lake water, associated with GL 89-13 requirements, are well maintained in order that their design basis mitigation functions are preserved. With these revised commitments, CPS will continue to meet the intent of GL 89-13. The CPS NRC Site Resident Inspector and NRC Project Manager will be informed of any future change in implementing CPS Generic Letter 89-13 activities.

Attachment 1 provides an affidavit supporting the facts set forth in this letter.

Sincerely yours,

J. G. Cook
Vice President

JSP/csm

Attachment

cc: NRC Clinton Licensing Project Manager
NRC Resident Office, V-690
Regional Administrator, Region III, USNRC
Illinois Department of Nuclear Safety

Attachment 1
to U-602504

J. G. Cook, being first duly sworn, deposes and says: That he is Vice President of the Nuclear Program at Illinois Power; that this letter supplying information for Generic Letter 89-13 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 letter and the facts contained therein are true and correct.

Date: This 24 day of October 1995.

Signed: _____
J. G. Cook

STATE OF ILLINOIS) SS.
DeWitt COUNTY)

" OFFICIAL SEAL "
Jacqueline S. Matthias
Notary Public, State of Illinois
My Commission Expires 11/24/97

Subscribed and sworn to before me this 24th day of October 1995.

Jacqueline S. Matthias
(Notary Public)