

APPENDIX B

TO FACILITY LICENSE NO. NPF- _____
CLINTON POWER STATION
UNIT 1

ILLINOIS POWER COMPANY

DOCKET NO. 50-461

ENVIRONMENTAL PROTECTION PLAN

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CLINTON POWER STATION

UNIT 1

ENVIRONMENTAL PROTECTION PLAN

(NON-RADIOLOGICAL)

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1.0 OBJECTIVES OF THE ENVIRONMENTAL PROTECTION PLAN

The Environmental Protection Plan (EPP) is to provide for protection of non-radiological environmental values during operation of the nuclear facility. The principal objectives of the EPP are as follows:

- (a) Verify that the Plant is operated in an environmentally acceptable manner, as established by the Final Environmental Statement-Operating License Stage (FES-OL).
- (b) Coordinate NRC requirements and maintain consistency with other Federal, State, and local requirements for environmental protection.
- (c) Keep NRC informed of the environmental effects of facility construction and operation and of action taken to control those effects.

Environmental concerns identified in the FES-OL which relate to water quality matters are regulated by way of IPC's (the licensee's) NPDES permit.

2.0 ENVIRONMENTAL PROTECTION ISSUES

In the FES-OL dated May 1982, the staff considered the environmental impacts associated with the operation of the Clinton Power Station. Certain environmental issues were identified which required study or license conditions to resolve environmental concerns and to assure adequate protection of the environment.

2.1 Aquatic Issues

- (a) Effluent limitations and monitoring requirements are contained in the effective NPDES permit issued by the Illinois Environmental Protection Agency (IL0036919). The NRC will rely on this agency for regulation of these matters as they involve water quality and aquatic biota.
- (b) One specific aquatic issue raised by the staff concerned the potential for the establishment of encephalitic human pathogenic thermophilic amoeba in Clinton Lake after power generation begins. The NRC will rely on the licensee to conduct amoeba monitoring in accordance with the recommendations of the Illinois Department of Public Health as stated in the FES-OL.

2.2 Terrestrial Issues

Steam fog from the station's cooling lake has the potential of reducing visibility over nearby roads and bridges. A fog monitoring program shall be initiated to determine the frequency and density of cooling lake-induced fog which could potentially cause highway safety hazards adjacent to the cooling lake. The NRC shall rely on the licensee to conduct a fog monitoring program in cooperation with the Illinois Department of Transportation and local highway safety officials as stated in the FES-OL.

3.0 CONSISTENCY REQUIREMENTS

3.1 Plant Design and Operation

The licensee may make changes in plant design or operation or perform tests or experiments affecting the environment provided such changes, tests or experiments do not involve an unreviewed environmental question, and do not involve a change in the EPP.* Changes in plant design or operation and performance of tests or experiments which do not affect the environment are not subject to the requirements of this EPP. Activities governed by Section 3.3 are not subject to the requirements of this section.

Before engaging in additional construction or operational activities which may affect the environment, the licensee shall prepare and record an environmental evaluation of such activity.** When the evaluation indicates that such activity involves an unreviewed environmental question, the licensee shall provide a written evaluation of such activities and obtain prior approval from the Director, Office of Nuclear Reactor Regulation. When such activity involves a change in the EPP, such activity and change to the EPP may be implemented only in accordance with an appropriate license amendment as set forth in Section 5.3.

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the FES-OL as modified by staff's testimony to the Atomic Safety and Licensing Board, supplements to the FES-OL, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level (in accordance with 10 CFR Part 51.5(b)(2)) or (3) a matter not previously

* This provision does not relieve the licensee of the requirements of 10 CFR 50.59.

** Activities are excluded from this requirement if all measurable environmental effects are confined to on-site areas previously disturbed during site preparation and plant construction.

reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in plant design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include a written evaluation which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question nor constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0. The licensee shall include as part of the Annual Environmental Operating Report (per Subsection 5.4.1) brief descriptions, analyses, interpretations, and evaluations of such changes, tests and experiments.

3.2 Reporting Related to the NPDES Permits and State Certification

Modifications to the NPDES permit or the State certification pursuant to Section 401 of the Clean Water Act shall be reported to the NRC within 30 days following the date the modified permit is reissued. If a permit or certification, in part or in its entirety, is appealed and stayed, the NRC shall be notified within 30 days following the date the stay is granted.

The NRC shall be notified of modifications proposed by the licensee to the effective NPDES permit by providing NRC with a copy of the proposed modification at the same time it is submitted to the permitting agency. The notification of a licensee-initiated modification shall include a copy of the requested modification submitted to the permitting agency. The licensee shall provide the NRC with a copy of its application for reissuance of the NPDES permit at the same time the application is submitted to the permitting agency.

3.3 Changes Required for Compliance with Other Environmental Regulations

Changes in plant design or operation and performance of tests or experiments required to achieve compliance with other Federal, State, or local environmental regulations are not subject to requirements of Section 3.1.

4.0 ENVIRONMENTAL CONDITIONS

4.1 Unusual or Important Environmental Events

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to station operation shall be recorded and promptly reported to the NRC within 24 hours by telephone, telegraph or facsimile transmissions followed by a written report per Subsection 5.4.2. The following are examples: excessive bird impaction events, onsite plant or animal disease outbreaks, mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973, significant fish kills, increase in nuisance organisms or conditions and unanticipated or emergency discharge of waste water or chemical substances.

No routine monitoring programs are required to implement this condition.

4.2 Environmental Monitoring

Deviations from required monitoring programs will not be a violation of license requirements if samples are accidentally spilled or contaminated, or if samples are unattainable due to hazardous conditions, seasonal unavailability, or malfunction of equipment.

4.2.1 NPDES Monitoring

The NRC shall rely on the Illinois Environmental Protection Agency for regulation of effluent limitations and all aquatic monitoring required under the NPDES permit.

4.2.2 Pathogenic Thermophilic Amoeba Monitoring

The NRC shall rely on the licensee to conduct amoeba monitoring in accordance with the recommendations of the Illinois Department of Public Health as stated in the FES-OL.

4.2.3 Steam-Fog Monitoring

The NRC shall rely on the licensee to conduct a fog monitoring program in cooperation with the Illinois Department of Transportation (IDOT) and local highway safety officials as stated in the FES-OL. The licensee shall cooperate with the IDOT and local highway safety officials in conducting the fog monitoring program, assessing the effects of fog upon public safety and implementing any mitigative measures if they are warranted.

Monitoring shall be conducted for one winter (November-March) after Unit One begins commercial operation as recommended in the FES-OL. The fog monitoring program shall terminate upon completion of the specified monitoring.

5.0 ADMINISTRATIVE PROCEDURES

5.1 Review and Audit

The licensee shall provide for review and audit of compliance with the EPP. The audits shall be conducted independently of the individual or groups responsible for performing the specific activity. A description of the organization structure utilized to achieve the independent review and audit function and results of the audit activities shall be maintained and made available for inspection.

5.2 Records Retention

The documentation listed below shall be made and retained in a manner convenient for review and inspection by the NRC. This documentation shall be retained for the life of the plant and made available to the NRC upon request.

- (a) Records of modifications to plant structures, systems, and components determined to potentially affect the continued protection of the environment.
- (b) Records, procedures, data, and logs relating to this EPP.
- (c) Preoperational environmental monitoring records, procedures, data and logs.
- (d) All other records and logs relative to the environmental aspects of plant operation.

5.3 Changes in Environmental Protection Plan

Requests for changes in the EPP, other than modifications to the NPDES permit or the State certification described in section 3.2, shall include an assessment of the environmental impact of the proposed change and a supporting justification. Implementation of such changes in the EPP shall not commence prior to NRC approval of the proposed changes in the form of a licensee amendment incorporating the appropriate revision to the EPP.

5.4 Plant Reporting Requirements

5.4.1 Routine Reports

An Annual Environmental Operating Report describing implementation of this EPP for the previous year shall be submitted to the NRC prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following issuance of the operating license. The period of the first report shall begin with the date of issuance of the operating license for Unit One.

The Annual Environmental Operating Report shall include:

- (a) A list of EPP noncompliances and the corrective actions taken to remedy them.
- (b) A list of all changes in station design or operation, tests, and experiments made in accordance with Subsection 3.1 which involved a potentially significant unreviewed environmental issue.
- (c) A list of nonroutine reports submitted in accordance with Subsection 5.4.2.
- (d) Any results and/or assessments for the environmental monitoring programs described in Subsection 4.2 of this EPP which were submitted to the respective regulatory agencies during the annual reporting period.

If harmful effects or evidence of trends towards irreversible damage to the environment are observed, the licensee shall provide a detailed analysis of the data and a proposed course of action to alleviate the problem.

In the event that some results are not available by the report due date, the report shall be submitted noting and explaining the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

5.4.2 Nonroutine Reports

A written report shall be submitted to the NRC within 30 days of occurrence of a nonroutine event. The report shall (a) describe, analyze, and evaluate the event, including extent and magnitude of these impact and plant operating characteristics, (b) describe the probable cause of the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective action taken to preclude repetition of the event and to prevent similar occurrences involving similar components or systems, and (e) indicate the agencies notified and their preliminary responses.

Events reportable under this subsection which also require reports to other Federal, State, or local agencies shall be reported in accordance with those reporting requirements in lieu of the requirements of this subsection. The NRC shall be provided with a copy of each report at the same time it is submitted to the other agency.