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ILLINOIS POWER COMPANY



CLINTON POWER STATION, P.O. BOX 678, CLINTON, ILLINOIS 61727

May 24, 1985

Docket No. 50-461

Director of Nuclear Reactor Regulation
Attention: Mr. W. R. Butler, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Clinton Power Station Unit 1
Periodic Testing of Diesel Generator Units
Regulatory Guide 1.108, Revision 1

Dear Mr. Butler:

The purpose of this letter is to request approval for an alternate method of meeting the intent of Section C.2.a of Regulatory Guide 1.108. A single test, which meets the requirements of paragraphs C.2.a.(1) and C.2.a.(2), will be performed at Clinton Power Station (CPS). Another test, which meets the requirements of Paragraph C.2.a.(3), will be performed as part of a "24-Hour Load Test." Paragraph C.2.a.(5) requires a test to be run to demonstrate functional capability at full-load temperature conditions by rerunning the test phase outlined in C.2.a.(1) and C.2.a.(2) immediately following C.2.a.(3). Illinois Power Company proposes to meet the intent of C.2.a.(5) by running either the 24-hour test as described in C.2.a.(3) or by running the diesel at 100% power (nominal) for a sufficient period of time to ensure that the units have reached a stabilized temperature prior to running the tests described in C.2.a.(1) and C.2.a.(2).

Illinois Power Company will initiate an FSAR change to address how CPS meets the Regulatory Guide after our position is accepted. The NRC's approval is requested by June 21, 1985. Should any further information be required, please contact us.

Sincerely yours,

F. A. Spangenberg
Director - Nuclear Licensing
and Configuration
Nuclear Station Engineering

JLP/lab

cc: B. L. Siegel, NRC Clinton Licensing Project Manager
NRC Resident Office
Regional Administrator, Region III, USNRC
Illinois Department of Nuclear Safety

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