

ILLINOIS POWER COMPANY



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

January 31, 1986

Docket No. 50-461

Director of Nuclear Reactor Regulation  
Attention: Dr. W. R. Butler, Director  
BWR Project Directorate No. 4  
Division of BWR Licensing  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Clinton Power Station  
Supplement 1 to NUREG-0737:  
Requirements for Emergency Response Capability

Dear Dr. Butler:

The purpose of this letter is to report the completion of the commitments made by Illinois Power Company (IP) with regard to NRC Generic Letter No. 82-33, Supplement 1 to NUREG-0737, "Requirements for Emergency Response Capability."

IP's Letter 0970-L of April 13, 1983, committed the company to a course of action to incorporate the requirements of Supplement 1 to NUREG-0737 and established an Emergency Response Capability Implementation Plan (ERCIP). The provisions of that plan are now complete as discussed herein.

1. UPGRADE EMERGENCY OPERATING PROCEDURE (EOP) PLAN

The provisions of the plan are fully implemented for the following:

- (1) Reactivity Control EOP
- (2) Level Control EOP
- (3) Containment Control EOP
- (4) Cooldown Control EOP
- (5) Secondary Containment/Radioactivity Release Control EOP

IP has committed to implement a hydrogen control EOP prior to exceeding 5% power. The basis for this procedure will be from work performed by the BWR Owners' Group and the Hydrogen Control Owners' Group (HCOG). An interim procedure similar to those utilized at other MARK III Containment BWR plants will therefore be implemented until final EOP is developed by the HCOG and approved by the NRC Staff.

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Add:

EB (LIAW)  
PSB (L. HULMAN)  
ETCSB (SRINIVASAN)  
RSB (ACTING)  
FOB (VASSALLO)  
AD - G. LAINAS (Ltr only)

A procedures Generation Package (PGP) was submitted to the NRC (via IP Letter U-0708, dated May 1, 1984). Staff comments were resolved and incorporated into the program (via IP Letter U-0755, dated October 24, 1984). Similarly, the EOPs have been reviewed by the Nuclear Steam Supply System vendor (General Electric) and comments incorporated. Operator training on the upgraded EOPs is complete.

2. DETAILED CONTROL ROOM DESIGN REVIEW (DCRDR) PLAN

The provisions of the plan are fully implemented with work in progress to correct those human engineering deficiencies identified for correction prior to Fuel Load. The NRC Staff reviewed the Summary Report of DCRDR activities (IP Letter U-600261, dated September 20, 1985) and conducted an audit to validate the program methodology and results. The program was evaluated as acceptable. Category A human engineering deficiencies (HEDs) will be implemented prior to Fuel Load. Category B HEDs shall be implemented within 180 days after Fuel Load. Category C HEDs shall be completed before Startup following the first refueling outage. A supplement to the DCRDR Summary Report shall be submitted to the Staff within six (6) months after Fuel Load. This supplement will address the results of the Staff's October 1985 DCRDR Audit and the Control Room Environmental Survey. Any modifications that are required as a result of IP evaluations of the audit open items and the Environmental Survey will be corrected before startup following the first refueling outage. Illinois Power understands that those items from Staff's DCRDR Audit which will be completed after Fuel Load will be addressed as a License Condition in the operating license.

3. REGULATORY GUIDE 1.97 (REVISION 3) PLAN

The provisions of the plan are fully implemented with work in progress to complete the last eight electric cable terminations to instruments. This work will be completed prior to Fuel Load. A Compliance Report documenting IP's position with respect to each instrument has been submitted and accepted by the NRC Staff. All post-accident monitoring instrumentation has been specially labelled in the Control Room for ease of recognition to the operators.

4. SAFETY PARAMETER DISPLAY SYSTEM (SPDS) PLAN

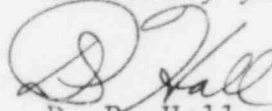
The provisions of the plan are fully implemented. Interaction with the NRC Staff at the SPDS Pre-Implementation Audit (December 1984) and via the Staff's review of the SPDS Dynamic Simulation Test Results (via IP Letter U-600250, dated September 13, 1985) have resulted in NRC acceptance of the SPDS program. Operator training on the program is complete.

5. EMERGENCY RESPONSE FACILITY (ERF) PLAN

Construction and outfitting of the Emergency Response Facilities are essentially complete. The operability of the facilities has been tested by a satisfactory Emergency Preparedness Exercise which was observed by the NRC on December 4, 1985. An ERF Design Report has been submitted to the Staff for review (IP Letter U-600288, dated November 12, 1985). The Staff has agreed to defer the audit of this program until after Fuel Load. IP will establish a mutually agreed upon date with the Staff for this audit.

If the Staff has any questions on these matters, please contact me or F. A. Spangenberg (Manager - Licensing & Safety).

Sincerely yours,



D. P. Hall  
Vice President

TLR/ckc

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