

ILLINOIS POWER COMPANY



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

September 18, 1985

Docket No. 50-461

Director of Nuclear Reactor Regulation
Attn: 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
Forty Year Operating License

Dear Mr. Butler:

The purpose of this letter is to request that the operating license for Clinton Power Station Unit 1 be granted for a term of forty years from the date of issuance of the license. The requested forty year term is consistent with NRC regulations, plant design, and environmental considerations.

Section 103(c) of the Atomic Energy Act of 1954 authorizes the NRC to issue commercial reactor operating licenses for a "specified period... but not exceeding 40 years." Provisions are made for such licenses in 10CFR50.51, entitled "Duration of License," namely:

"Each license will be issued for a fixed period of time to be specified in the license but in no case to exceed 40 years from the date of issuance. Where the operation of a facility is involved the Commission will issue the license for the term requested by the applicant or for the estimated useful life of the facility if the Commission determines that the estimated useful life is less than the term requested."

This regulation, as interpreted by the NRC Staff for recently issued Operating Licenses, supports our position that the operating license be granted for a term of forty years. In addition, Section 50.51 states that the license should commence "from the date of issuance", not from a date prior to issuance.

Clinton Power Station Unit 1 and its associated facilities were designed to meet the objective of forty years of commercial service. Any components that require replacement or refurbishment during that forty year service life of the Station will be controlled by our maintenance and surveillance program. Additionally, all safety margins were established with the understanding of the limitations that are imposed by a forty year design life.

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There is no significant adverse environmental impact associated with extending the operating life of Clinton Power Station Unit 1 to forty years. The station is located in a rural area where population growth over its forty year lifetime is expected to be small. The impact of continued plant operation upon the terrestrial and aquatic ecosystems from chemical, thermal, radioactive, and other waste discharges would remain small. A forty year operating term would extend the socio-economic benefits from the operation of the station through the continuing production of electricity, personnel employment, and tax payments. Extension of the operating life will also defer the capital costs and environmental impacts of replacement generating capacity.

Illinois Power asks that the NRC staff grant our request to have the operating license for Clinton Power Station Unit 1 issued for a full forty year term beginning with the date of issuance. Upon consideration of the human and capital resources which have gone into the Station's design and construction, issuance of a forty year operating license serves the best interests of the NRC, the applicant, and the public.

Sincerely yours,

D. W. Wilson for

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

DWW/lab

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