

AmerGen

An Exelon/British Energy Company

Clinton Power Station

R.R. 3 Box 228
Clinton, IL 61727-9351
Phone: 217 935-8881

U-603550

1A.120

April 22, 2002

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Clinton Power Station
Facility Operating License No. NPF-62
NRC Docket No. 50-461

Subject: Annual Environmental Operating Report

In accordance with Appendix B to the Clinton Power Station Technical Specifications, Clinton Power Station's Environmental Protection Plan (EPP), AmerGen Energy Company, LLC (AmerGen) is submitting the attached Annual Environmental Operating Report. This report covers the period of January 1, 2001 through December 31, 2001.

Respectfully,



Michael J. Pacilio
Plant Manager
Clinton Power Station

RSF/

Attachment

cc: Regional Administrator - NRC Region III
NRC Senior Resident Inspector – Clinton Power Station
Office of Nuclear Facility Safety - Illinois Department of Nuclear Safety

JE25

Annual Environmental Operating Report

The Environmental Protection Plan (EPP) for Clinton Power Station (CPS) requires that the Annual Environmental Operating Report 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 of the EPP which involved a potentially significant unreviewed environmental issue.
- (c) A list of non-routine reports submitted in accordance with subsection 5.4.2 of the EPP.
- (d) Any results and/or assessments for the environmental monitoring programs described in subsection 2.0 of the EPP which were submitted to the respective regulatory agencies during the annual reporting period.

The following provides AmerGen's response to each listed item for Clinton Power Station:

- A. A list of EPP noncompliances and the corrective actions taken to remedy them:

- 1. Noncompliance:

At 0907 on April 9, 2001, a sample collected from the National Pollutant Discharge Elimination System (NPDES) compliance sample point for Division 3 of the Shutdown Service Water (SX) system (NPDES Outfall 007) was analyzed to contain a Total Residual Chlorine (TRC) concentration of 0.54 mg/l. The NPDES permit limit for this outfall is 0.05 mg/l. An additional sample was collected at 0930 and analyzed to contain a TRC concentration of 0.64 mg/l. The NPDES compliance sample is collected once per week during a Division 3 Diesel Generator flush because that is typically the only time there is water flow in Division 3 SX. The SX Division 3 Diesel Generator flush was commenced at 0815 and secured at 1138 on April 9, 2001. The Service Water (WS) chlorination system, which supplies chlorine to the SX system, was shut down at 0956.

TRC concentration was caused by a lack of sodium bisulfite injection to Division 3 SX upstream of the NPDES compliance sample point. Sodium bisulfite is injected into the SX system to remove the chlorine in the system. Two sodium bisulfite pumps are provided, with one in service at any time. The pumps share a common discharge line. It appeared to the vendor representative who serviced the backpressure valve that the valve diaphragm was stuck to the seat, thus preventing sodium bisulfite flow past the valve. In this condition, the operating pump recirculated sodium bisulfite back to its suction.

The common sodium bisulfite discharge line is also equipped with a flow sensor that provides a signal to shut down the WS chlorination system when a loss of flow is detected. However, the flow sensor was apparently defective, and had indicated flow since the start of WS chlorination at 0700 (otherwise the WS chlorination system would not have started). The flow sensor was replaced.

Corrective Action:

The backpressure valve in the common discharge line was disassembled, cleaned and reassembled. Additionally, preventive maintenance was implemented to periodically remove and clean the diaphragm on the sodium bisulfite valves. In addition, another preventive maintenance activity was implemented to replace the flow sensors annually.

2. Noncompliance:

In December of 2001, PDC Laboratories, an outside laboratory that provides CPS with NPDES analysis, failed to properly analyze Outfall 002a (Sewage Lagoon), for Biological Oxygen Demand (BOD5). Instead, they analyzed Outfall 002a for Total Suspended Solids (TSS) and Total Dissolved Solids (TDS). This error left the station without a BOD5 analysis for the week, which is required by the NPDES Permit.

PDC Laboratories utilizes a computer-based program to log and track samples received from various clients. The deficiency occurred when the PDC Laboratories technician logged the weekly Outfall 002a sample data from CPS into the computer. The Technician first logged the sample for Outfall 003 (Sediment Pond), which is required to be analyzed for TSS and TDS. The Technician copied the screen template containing the Outfall 003 analysis requirements and used it for the next sample entry, which was for Outfall 002a. The Technician failed to recognize and correct the analysis requirements for Outfall 002a resulting in the sample not being analyzed for BOD5. Further, the PDC Laboratory supervisor and program manager missed the error during the independent review process.

A contributing cause for this noncompliance was that the CPS Environmental Specialist normally interfaced with the PDC Laboratories' program manager for drinking water analysis. The program manager for drinking water did not have the correct analysis requirements for Outfall 002a and did not recognize the need to analyze Outfall 002a for BOD5. Additionally, a wastewater template was not in place for CPS.

Corrective Action:

1) PDC Laboratories now faxes the logged in sample information to CPS for review to ensure the samples are analyzed properly.

2) The CPS account for wastewater has been turned over to a wastewater program manager at PDC Laboratories.

- B. A list of all changes in station design or operation, tests, and experiments made in accordance with subsection 3.1 of the EPP that involved a potentially significant unreviewed environmental issue:

There were no changes in station design or operation, tests, and experiments made in accordance with subsection 3.1 of the EPP which involved a potentially significant unreviewed environmental issue.

- C. A list of non-routine reports submitted in accordance with subsection 5.4.2 of the EPP:

Clinton Power Station submitted one non-routine report to the NRC in accordance with subsection 5.4.2 of the EPP during 2001. CPS submitted "Non-Routine Report on Clinton Lake Fish Kill," dated February 22, 2001, via AmerGen letter U-603459.

- D. Any results and/or assessments for the environmental monitoring programs described in subsection 2.0 of the EPP which were submitted to the respective regulatory agencies during the annual reporting period:

There were no results and/or assessments submitted to regulatory agencies regarding environmental monitoring programs described in subsection 2.0.