

ILLINOIS POWER COMPANY



U-0129

L32-80(03-14)-9

500 SOUTH 27TH STREET, DECATUR, ILLINOIS 62525

March 14, 1980

Mr. Richard C. DeYoung, Director
Division of Site Safety & Environmental Analysis
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. DeYoung:

Clinton Power Station Units 1 & 2
Docket Nos. 50-461 and 50-462
Construction Permits No. CPPR-137 & CPPR-138

The purpose of this letter is to inform you that Illinois Power Company is planning to submit soon a petition to the Illinois Pollution Control Board requesting that they modify the alternate thermal standard adopted in 1975 for the Clinton Power Station. The U.S.E.P.A., Region V had 316(a) jurisdiction during the original proceeding at which the alternate thermal standard for the Clinton Power Station was approved. Since that time, the State of Illinois has been delegated NPDES authority and concomitant 316(a) and 316(b) jurisdiction. Several factors prompted us to reevaluate the appropriateness of the existing 96°F temperature limit for Lake Clinton. These are:

1. Improvement in the state-of-the-art of thermal modeling.
2. The fact that recent research on the biological significance of thermal additions has shown that discharge temperatures greater than 96°F are not necessarily harmful and site-specific limits of up to 111°F have been established for other Midwestern cooling lakes.
3. The length of time that unit #1 will be operating prior to unit #2 coming on line has been expanded from the one year as originally proposed to at least 5 years.
4. The impact of energy requirements for cooling sprays on net station output (which would be a maximum at the normal period of peak electricity demand on our system).

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Mr. Richard C. DeYoung

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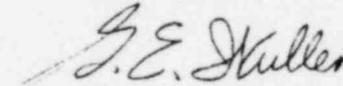
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After considering the above factors, Illinois Power Company has decided to petition the Illinois Pollution Control Board for an alternate thermal standard to be applicable during one unit operation. This matter was never addressed in the original 316(a) demonstration because the original plan called for Unit #2 to come on-line within one or two years after Unit #1 was operational.

We are aware that U.S.E.P.A. (or a State which has been delegated NPDES authority) is the agency with authority to grant alternate thermal limitations under Section 316(a) of the Clean Water Act and we plan to work closely with both the State and Region V of the USEPA. In discussing this matter with Mr. Donald Sills of the NRC, he suggested that the NRC staff be kept apprised of our actions to have an alternate thermal standard approved. Thus, we plan to send you copies of our petition to the Illinois Pollution Control Board along with appropriate support documents for your information.

We invite your comments on our plans, and we would appreciate receiving your indication of concurrence with our effort to enhance the total performance of this unit.

Sincerely,



G. E. Wuller
Supervisor-Licensing
Generation Engineering Department

GEW/jh

cc: Robert A. Gilbert
NRC Clinton Environmental Manager