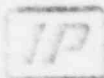


50-461

ILLINOIS POWER COMPANY



500 SOUTH 27TH STREET, DECATUR, ILLINOIS 62525

January 5, 1981

Mr. James R. Miller, Branch Chief
Standardization and Special Projects Branch
Division of Licensing
Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Miller:

This is in response to Mr. Tedesco's letter of December 16, 1980 to Mr. Gerstner. We are pleased to learn that the licensing responsibility for the Clinton project has been assigned and we look forward to working with you in carrying out the licensing of the Clinton Station.

We have met with Mr. Denton and members of the NRC Staff to review various means of simplifying the licensing process. I am enclosing a copy of a letter to Mr. Denton which summarized our objectives and understandings. You will note that we have suggested a somewhat different approach to the "independent design review" (IDR) described in Mr. Tedesco's letter. We believe that our suggestions may be more appropriate for the Clinton licensing review than the IDR system. We are prepared to present detailed presentations of the type we proposed and an introductory session on Chapter 7 is scheduled for January 7, 1981 at the Clinton Station.

In reviewing the written preliminary review schedule enclosed with Mr. Tedesco's letter, we find that many activities are scheduled later than we believe to be prudent. We have scheduled fuel loading for January 1983 and have scheduled our construction and startup activities to conform to that date. We recognize that the NRC Case Load Panel estimated the fuel load date to be August 1983, but their estimate was based primarily on the amount of electrical work remaining. The Panel agreed that if the electrical work can be expedited, the fuel load date can be advanced. We are scheduling the remaining work to accomplish this. Also, we anticipate a contested hearing and we believe it would be prudent to assume some delay in the hearing process. As a result, we believe your "Clinton Preliminary Review Schedule" should be revised to move the activities forward and particular emphasis should be placed on advancing the early activities.

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January 5, 1981

Our initial conversations with the Staff indicated the first round of questions could be accelerated and minimized if Illinois Power addressed the round one questions on the Grand Gulf docket. We are proceeding on this basis and hope to accomplish that objective. Advancing the schedule for the first round questions and responses would appear to provide the best opportunity for accelerating the total schedule and the best opportunity for avoiding licensing delays.

We are prepared to work with you to simplify the licensing process and to conserve the limited resources available to both our organizations. In the meantime, if we can provide any additional information, please advise.

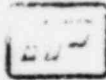
Sincerely,



L. J. Koch
Vice President

Enclosure

cc: R. L. Tedesco
C. Grimes
D. G. Eisenhut
D. F. Ross



August 11, 1980

Dr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Dr. Denton:

Clinton Power Station
Operating License Review
Docket Nos. 50-461 and 50-462

This letter will confirm some of the comments and commitments which I made to you during our recent conversations. They relate to the operating license application for the Clinton Power Station submitted to the NRC by Illinois Power Company in December 1979. The primary thrust of these conversations involved the need to accelerate the Clinton license review and the incentive for IPC to take the initiative to simplify the review process where possible. We understand that the Clinton application will be docketed in the very near future. Therefore, we believe that it would be beneficial to both NRC and IPC to begin formulating definitive plans for the Clinton licensing review.

We recognize the additional burdens which have been placed on the NRC Staff as the result of the TMI accident and the need to most efficiently utilize NRC resources. In recognition of these conditions, we have made and are continuing to make a detailed evaluation of the licensing process with the intent of identifying specific segments of that process where we can take actions to reduce the demands on NRC resources. We believe we have identified areas where such opportunities exist. In general, they fall in two major categories:

1. Those parts of the Clinton application which are not unique and which the NRC Staff has previously reviewed on other dockets, and
2. Those parts of the Clinton application which are unique and which the NRC Staff has not previously reviewed.

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In the first case, we believe that we can identify in detail the Clinton FSAR information which the NRC Staff has approved on other dockets. This should avoid the need for the Staff to review the same material again. In the second case, we believe that we can not only identify new material for the Staff, but we can also provide additional information and improve means of communication to assist the Staff in their efficient review and evaluation of this material. In other words, we can "codify" the Clinton application in such a way as to assist the Staff in identifying those parts of the application which merit their primary attention.

Our review of the Clinton application has proceeded to the stage where we can identify several chapters of the Clinton FSAR where material has already been reviewed by the Staff on previous dockets and the docket on which the review was made. This should enable the Staff to significantly reduce the time which will be required to review these chapters.

Similarly, we believe that there are at least three chapters which contain significant amounts of new material and information which the Staff has not seen previously. Much of this material also represents technological advances in our industry which will be of particular interest to the Staff. This information deserves special attention and we would propose to give it such attention.

A third area which we are giving special attention involves licensing reviews which are proceeding ahead of us. We are maintaining cognizance of the NRC licensing reviews of other BWR's with particular attention to the Grand Gulf application which is also a BWR-6/Mark III (although a larger size). We believe that we can respond in a timely manner to all of the Grand Gulf Round 1 questions and thereby avoid the necessity for a similar round of questions for Clinton. We will identify where the responses to the Grand Gulf questions appear in the Clinton FSAR which will simplify the Staff review of our responses. Our objective, of course, is to place the Clinton review on a schedule which permits moving directly to the Round 2 issues. This would serve to minimize the demands on the NRC Staff and could significantly shorten the licensing schedule without reducing the quality of the review.

The required number of copies of the application documents have been prepared and are packed, ready for shipment to the NRC. They will be shipped immediately upon notification of docketing and the normal request for these copies. Shortly thereafter, we will request meetings with you and your Staff to make specific

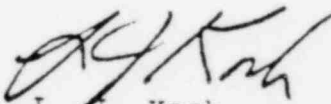
August 11, 1980

detailed proposals for proceeding with the Clinton licensing review in accordance with the general outline described above. We will be prepared to discuss with you and your Staff in detail how we propose to proceed and to incorporate other improvements which you may wish to suggest. We will be in contact with you shortly after docketing to establish a schedule for these meetings.

We are quite enthusiastic about the possibility of reducing the time and effort which are now required of the NRC and the licensee in the present licensing process. We believe that a real potential exists and that we will have some productive recommendations to make. We are quite willing to serve as a "model" in this undertaking and to be innovative in a joint effort which can contribute to the utilization of our collective licensing resources more effectively. We have received commitments from General Electric Company and Sargent & Lundy Engineers to participate aggressively in this effort.

We are encouraged by the knowledge that you are giving much consideration to improving the licensing process. We would be very pleased to work with you to accomplish this objective and to demonstrate that licensing can be accomplished more effectively without sacrifice of the quality of the license.

Sincerely,



L. J. Koch
Vice President

cc: Walter R. Smith, President
Soyland Power Cooperative, Inc.

Lester W. Aeilts, President
Western Illinois Power Cooperative, Inc.