

EXHIBIT A

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF )  
ILLINOIS POWER COMPANY )  
SOYLAND POWER COOPERATIVE, INC. ) Docket Nos. 50-461 OL  
and WESTERN ILLINOIS POWER ) 50-462 OL  
COOPERATIVE, INC. )  
  
(Operating Licenses for Clinton )  
Power Station, Units 1 and 2) )

CONFIDENTIALITY AGREEMENT

The State of Illinois and the Prairie Alliance (collectively "Intervenors"), by their attorneys or representatives, hereby agree with Applicant Illinois Power Company ("Illinois Power") that the production of documents by Illinois Power in response to Intervenors' discovery requests shall, with respect to documents not otherwise available to the general public, be subject to the following terms and conditions:

1. No information discovered by Intervenors from such documents shall be communicated to any person or entity not a party to these proceedings, nor to any Intervenor's personnel, agents, consultants, or attorneys not actively participating in this proceeding, except upon written consent of Illinois Power or upon order of the Nuclear Regulatory Commission ("NRC").
2. Information discovered from such documents shall be subject to such further protection from disclosure as the NRC may order, and Intervenors shall not oppose any petition for further protection on the grounds that the documents to which it relates have already been produced.
3. This agreement shall be enforceable as if it were a protective order issued by the NRC under 10 CFR 2.740(c).
4. Information discovered from such documents shall be subject to such further disclosure as the NRC may order, and Illinois Power shall not oppose any petition for further disclosure on the grounds that the petitioner has signed this agreement.

5. This agreement shall apply only to documents produced by Illinois Power on September 24, 1981, which are those documents produced with respect to Prairie Alliance Contention No. 6 and listed on Exhibit A hereto, and those documents contained in the following Nuclear Station Engineering Department files: (1) Quality Assurance, (2) Management, and (3) Fabrication and Construction.

STATE OF ILLINOIS

ILLINOIS POWER COMPANY

By: Reed W. Newman  
One of its attorneys

By: William Van Luster  
One of its attorneys

PRAIRIE ALLIANCE

By: Susan C. Bruck  
Susan Bruck

Paul Meuth  
Paul Meuth

EXHIBIT B

B.W.R. Owner's Group

<u>Document Control No.</u>	<u>Subject</u>
304	BWR Owner's Group Emergency Procedure Guidelines, Rev. 1, and Responses to Related NRC Questions
500	The Executive Status Report, July 1980
501	The Executive Status Report, August 1980
502	Utility/NRC Executive Meeting on BWR OG SRV Testing, October 22, 1980 (Conference Report)
503	November 19-20, General Meeting Voting Issues (BWR OG)
504	NUREG-0737 Tasks II.K.3.15 "HPCI/RCIC Break Detection" and II.K.3.21 "CS, LPCI Restart"
505	BWR OG Special Meeting on SRV Performance Testing, November 6, 1980
506	BWR OG Executive Status Report, November 1980
507	BWR OG Control Room Committee, February 3 & 4, 1981
508	BWR OG Executive Summary Report, January 1981
509	Control Room Committee Meeting Notice for April 14 & 15, 1981
510	BWR OG Emergency Procedures Committee Meeting, February 24, 25 & 26, 1981
511	BWR OG Working Group on Displays, Meeting Minutes - April 29 & 30, 1981
512	BWR OG Participants for Preliminary Assessment of Control Room CRT Displays
514	BWR Control Room Graphic Display System Evaluation Program
600	NUREG-0678 Implementation and Transmittal of Miscellaneous Items
604	Utility Review of BWR OG Approach on NUREG-0660 Item II.K.3.44
607	BWR OG Executive Status Report, October 1980
634	Emergency Response Information System Conceptual Design and Control Room Committee Meeting with the NRC
700	BWR OG Control Room Modification Subcommittee Meeting
701	BWR OG General Meeting Agenda
702	Travelplan Information to BWR OG Control Room Survey Program Workshop
703	BWR OG Control Room Subcommittee Notice of Meeting Change of Place
704	BWR OG Conference Reports on Control Room Committee Meetings
705	BWR OG Control Room Modification Subcommittee Meeting and the NSAC
706	TMI-Accepted Proposals
707	BWR OG Executive Status Report, February 1981

B.W.R. Owner's Group

Document  
Control  
No.

Subject

708	EOF & TSC Information Systems Preliminary Functional Specifications to BWR OG Control Room Committee Members
709	BWR OG Control Room Committee, March 10 & 11, 1981 Conference Report
710	BWR OG Executive Status Report, March 1981
711	BWR OG Control Room Modification Subcommittee, Denver Meeting Notes
712	BWR OG Executive Status Report, May 1981
713	BWR OG Control Room Modification Subcommittee, . NSAR/Palo Alto 5/30/80 Meeting Notes
714	BWR OG Executive Status Report, May 1981
715	NRC/BWR OG Control Room Committee Meeting Notes
802	BWR OG Control Room Workshop/CP & NTOL Members
803	ANS/Human Factors Review of BWR Control Rooms

General Electric, Sentry Corporation,  
Technology For Energy Corporation, and  
Sargent and Lundy Documents

403	Adjustment to TEC Proposal (Item 402)
404	Correspondence and Adjustments to TEC Proposal (Item 402)
405	Intent Letter for Purchase of TEC Safety Relief Valve Monitoring System
515	Emergency Response Information System, GE Quotation
601	PASS Design Documentation
610	Post Accident Sampling Workshop Report
611	PASS, Sentry Proposal
615	Sentry PASS Proposal Adjustment
616	Sentry Letter of Clarification
619	PASS Proposal Evaluations
620	PASS, Sentry QA Acceptance
623	PASS, Sentry QA Acceptability
624	PASS Trip Report
625	PASS, Sentry QA Acceptability
626	PASS, Sentry QA Acceptability
627	GE BWR Assessment after TMI
629	PASS Authorization
633	PASS Design Changes
636	PASS, Letter of Clarification
637	PASS, Status Telecon
640	S&L TMI Issues Responses

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:

Hugh K. Clark, Chairman  
Dr. George A. Ferguson  
Dr. Oscar H. Paris

IN THE MATTER OF	)	
ILLINOIS POWER COMPANY,	)	
SOYLAND POWER COOPERATIVE, INC.	)	
and WESTERN ILLINOIS POWER	)	
COOPERATIVE, INC.	)	Docket No. 50-461 OL
	)	
(Operating License for Clinton	)	
Power Station, Unit 1)	)	

PROTECTIVE ORDER

The Nuclear Regulatory Commission ("NRC") hereby orders that the discovery by Intervenor Prairie Alliance ("Intervenor") of Illinois Power Company ("Illinois Power") documents identified in the attached Exhibit A, and of Illinois Power documents relating to Contention 9, be subject to the following terms and conditions:

1. No information discovered by Intervenor from such documents shall be communicated to any person or entity not a party to this proceeding, nor to any of Intervenor's personnel, agents, consultants, or attorneys not actively participating in this proceeding, except as necessary in connection with Intervenor's preparation for this proceeding or with the prior written consent of Illinois Power, or upon order of the NRC.

2. Information discovered from such documents shall be subject to such further disclosure or further protection from disclosure as the NRC may order, upon petition from any party and for good cause shown.

THE ATOMIC SAFETY AND  
LICENSING BOARD

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Hugh K. Clark, Chairman  
ADMINISTRATIVE JUDGE

---

Oscar H. Paris  
ADMINISTRATIVE JUDGE

---

George A. Ferguson  
ADMINISTRATIVE JUDGE



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600	NUREG-0578 Implementation and Transmittal of Miscellaneous Items
604	Utility Review of BWR OG Approach on NUREG-0660 Item II.K.3.44
607	BWR OG Executive Status Report, October 1980
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627	GE BWR Assessment after TMI
629	PASS Authorization
633	PASS Design Changes
636	PASS, Letter of Clarification
637	PASS, Status Telecon
640	S&L TMI Issues Responses



CERTIFICATE OF SERVICE

I hereby certify that an original and two conformed copies of the foregoing document were served upon the following:

Secretary of the Commission  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555  
Attention: Docketing and Service Branch

and that one copy of the foregoing document were served upon each of the following:

Hugh K. Clark, Esq., Chairman  
P. O. Box 127A  
Kennedyville, Maryland 21645

Dr. George A. Ferguson  
School of Engineering  
Howard University  
2300 Sixth Street, N.W.  
Washington, D.C. 20059

Dr. Oscar H. Paris  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Executive Legal Director  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555

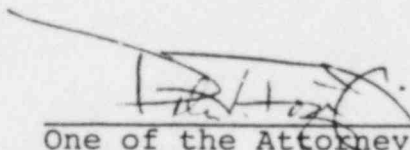
Philip L. Willman  
Assistant Attorney General  
Environmental Control Division  
188 West Randolph Street  
Suite 2315  
Chicago, Illinois 60610

Prairie Alliance  
P. O. Box 2424  
Station A  
Champaign, Illinois 61820

Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Atomic Safety and Licensing  
Appeal Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

in each case by deposit in the United States Mail, postage  
prepaid on January 6, 1982.

  
\_\_\_\_\_  
One of the Attorneys for  
Applicants

Peter V. Fazio, Jr.  
Sheldon A. Zabel  
William Van Susteren  
Charles D. Fox IV  
SCHIFF HARDIN & WAITE  
7200 Sears Tower  
233 South Wacker Drive  
Chicago, Illinois  
(312) 876-1000

DOCKETED  
USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF )  
ILLINOIS POWER COMPANY, )  
SOYLAND POWER COOPERATIVE, INC. )  
and WESTERN ILLINOIS POWER )  
COOPERATIVE, INC. )

Docket No. 50-461 OL

(Operating License for Clinton )  
Power Station, Unit 1) )

NOTICE

To:

Hugh K. Clark, Esq., Chairman  
P. O. Box 127A  
Kennedyville, Maryland 21645

Dr. George A. Ferguson  
School of Engineering  
Howard University  
2300 Sixth Street, N.W.  
Washington, D.C. 20059

Dr. Oscar H. Paris  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Executive Legal Director  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Philip L. Willman  
Assistant Attorney General  
Environmental Control Division  
188 West Randolph Street  
Suite 2315  
Chicago, Illinois 60610

Prairie Alliance  
P. O. Box 2424  
Station A  
Champaign, Illinois 61820

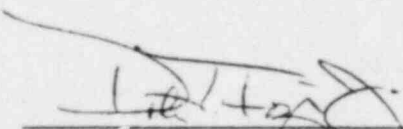
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555



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Atomic Safety and Licensing  
Appeal Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

PLEASE TAKE NOTICE that I have filed with the Secretary of the United States Nuclear Regulatory Commission MOTION FOR PROTECTIVE ORDER in the above-captioned matter. A copy of this document is attached hereto and hereby served upon you.

  
\_\_\_\_\_  
One of the Attorneys for  
Applicants

Peter V. Fazio, Jr.  
Sheldon A. Zabel  
William Van Susteren  
Charles D. Fox IV  
SCHIFF HARDIN & WAITE  
7200 Sears Tower  
233 South Wacker Drive  
Chicago, Illinois 60606  
(312) 876-1000

Dated: January 6, 1982