

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

RESPONSE OF ILLINOIS POWER TO THE
STATE OF ILLINOIS' ADDITIONAL SECOND
ROUND INTERROGATORIES TO APPLICANTS

Illinois Power Company ("Illinois Power" or "the Company"),
on behalf of itself, Soyland Power Cooperative, Inc., and Western Illinois
Power Cooperative, Inc. ("Applicants"), hereby responds to the State of
Illinois' ("Illinois") Additional Second Round Interrogatories to Applicants
as follows:

A. General

[General Interrogatory No. 1: Identify all persons who
have assisted in any way in the preparation of each
answer to each interrogatory below and describe the
substance of each person's assistance.]

ANSWER: All information supplied on Contention 2 was prepared under
the supervision and direction of Allan J. Budnick, Director-Quality Assur-
ance. All information supplied on Contention 5 was prepared under the
supervision and direction of Julius D. Geier, Manager - Nuclear Station
Engineering Department.

[General Interrogatory No. 2: Identify all documents that were relied upon to provide an answer to each interrogatory below, and describe the substance of each document so used.]

ANSWER: No documents were relied upon to provide an answer to any of these interrogatories.

[General Interrogatory No. 3: Identify all persons whom IP plans to call to testify as to each contention, and state the qualifications of each person so identified.]

ANSWER: Illinois Power has not yet determined which persons it will call as witnesses should a hearing prove necessary.

[General Interrogatory No. 4: Describe for each interrogatory any additional research or work, if any, that IP plans to do that will affect the answer.]

ANSWER: Unless otherwise noted, or unless new information indicates the need for further investigation, Illinois Power does not plan to conduct further research or work which may affect the answer relative to a particular interrogatory.

B. Contention 2

[5. With respect to the answer given to Interrogatory 3.d in IP's Supplemental Response to Illinois' First Set of Interrogatories, specifically under the heading of "Baldwin Associates Quality Control Employees", please state:

- a) whether, to IP's knowledge, any of the 70 former employees included in the category "resigned-to accept new position" did so as a result of dissatisfaction or disagreement with the QC

program for CPS-1, and if so state the name and most current address of each such employee.

- b) whether any of the 3 discharges based upon "insubordination" involved or resulted from expressed criticisms, or refusal to follow specified procedures on professional grounds, of the QC program for CPS-1, and if so state the name and most current address of each such employee.
- c) whether any of the 15 employees transferred to other BA departments were moved as a result of criticism, dissatisfaction or disagreement with the QC program for CPS-1, and if so state the name and most current address of each such employee.]

ANSWER: To the best of Illinois Power's knowledge, none.

- [6. With respect to the answer given in Interrogatory 3.d in IP's Supplemental Response to Illinois' First Set of Interrogatories, specifically under the heading of "Illinois Power Quality Assurance Employees", please state whether, to IP's knowledge, any of the former employees included in the category "resigned-to accept new position", did so as a result of dissatisfaction or disagreement with the QC program for CPS-1, and if so state the name and most current address of each such employee.]

ANSWER: To the best of Illinois Power's knowledge, none.

- [7. With respect to the answer given to Interrogatory 3.d in IP's Supplemental Response to Illinois' First Set of Interrogatories, specifically under the heading of "Illinois Power Quality Assurance Employees", please clarify the apparent discrepancy between the number of employees given therein who were either transferred or terminated and the number of QA employees transferred or terminated shown in Exhibit K, attached in answer to Interrogatory 3 in IP's initial Answers to Illinois' First Set of Interrogatories.]

ANSWER: The information presented in Exhibit K was correct. The answer to Interrogatory No. 3.d should have read as follows:

Illinois Power Quality Assurance Employees

<u>Reason for Termination</u>	<u>Number of Employees</u>
Resigned - to accept new position	9
Transferred - to another IPC Dept.	7
Resigned - Husband transferred	1
Resigned - return to school	1

C. Contention 5

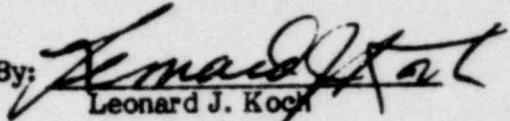
- [8. State whether IP has made the minor modifications at CPS-1 that render SCRAM reliability sufficient to meet the NRC Staff safety goal of 10^{-6} /reactor year.]

ANSWER: The original design of the CPS-Unit 1 scram system has been modified to increase reliability. The probability of occurrence of an ATWS event at CPS Unit 1 is of the order of magnitude of 10^{-6} per reactor year.

- [9. If the answer to Interrogatory 8 above is negative, then state:
- a) which minor modification(s) IP has not made; and
 - b) whether and when IP plans to make such modification(s).]

ANSWER: See answer to Interrogatory No. 8.

ILLINOIS POWER COMPANY

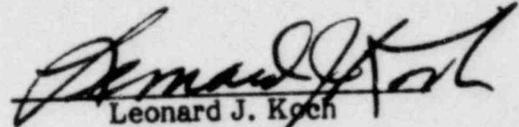
By: 
Leonard J. Koch
Vice President

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

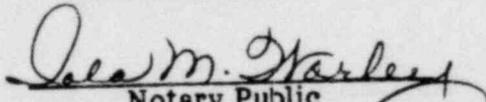
DATED: February 19, 1982

STATE OF ILLINOIS)
)
COUNTY OF MACON) SS

Leonard J. Koch, being duly sworn, deposes and says that he is Vice President of Illinois Power Company, one of the Applicants in this proceeding; that he has read the foregoing Response of Illinois Power to the State of Illinois' Additional Second Round Interrogatories to Applicants, and that the same are true and correct to the best of his knowledge, information, and belief.


Leonard J. Koch
Vice President

SUBSCRIBED and SWORN to
before me this 19th day
of February, 1982.


Notary Public