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U-602141  
L30-93(060)LP  
8G.130

50-461

June 9, 1993

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington D.C. 20555

Subject: Illinois Power's Response to Bulletin 93-02, "Debris Plugging of  
Emergency Core Cooling Suction Strainers"

Dear Sir:

The Nuclear Regulatory Commission's (NRC) Bulletin 93-02 requested Illinois Power (IP) to identify fibrous air filters or other temporary sources of fibrous material not designed to withstand a Loss of Coolant Accident (LOCA) which are installed or stored in the primary containment at Clinton Power Station (CPS). The NRC requested that immediate compensatory measures be taken to assure the functional capability of the Emergency Core Cooling System (ECCS) due to the potential for plugging of the ECCS suction strainers from fibrous material.

At CPS, the only fibrous material used within the containment or the drywell, that is not located within a separate room, is a rigid (board form) fiberglass insulation material that is used in the containment and drywell coolers. The material is used to protect the coolers from sweating and is installed as a liner on the inside of the equipment enclosures. The coolers are LOCA-qualified devices and their construction is such that the rigid fiberglass material is enclosed and encapsulated within the coolers. This construction assures that the material will remain in place and not be transported into the suppression pool during a LOCA.

Materials that are used or stored in the containment are controlled by CPS procedure 1019.04, "Control of Transient Equipment and Foreign Material Exclusion Areas (FMEA)." The procedure provides for the logging, storage and securing of all materials that are used within the primary containment during operational modes 1, 2, and 3, when reactor coolant is above 200 degrees. Whenever the control of materials program is suspended (e.g., during outages), a walkdown of containment and the drywell is required to ensure compliance with the procedure prior to reentering modes 1, 2, or 3.

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The installation of temporary equipment is controlled by the temporary modification program. The program requires that any equipment modifications receive a design review prior to installation. This review ensures that any material is installed in a manner which protects against the possibility of the material being transported into the suppression pool.

At CPS, a Suppression Pool Cleanup system provides continuous cleanup of the suppression pool water. The system removes most suspended solids from the suppression pool water. The suppression pool water clarity is good, allowing personnel to perform a visual inspection of the pool, including the strainers. This enables personnel to identify any debris that could restrict the flow of water into the strainers. Supervisors/assistant supervisors are responsible for performing monthly tours of the plant, including containment. Material deficiencies are identified and corrected in accordance with the CPS maintenance program.

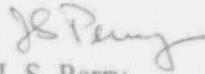
In summary, fibrous filter material not designed to withstand a LOCA is not used in the containment at CPS. A walkdown of the primary containment and a review of all open temporary modifications indicates that procedure controls have been and remain effective.

No compensatory measures are required and, since no fibrous material not designed to withstand a LOCA is installed or stored in the containment, no schedule for removal of such material is required.

In response to the NRC's request for information relative to the cost of complying with this bulletin, CPS personnel have expended approximately 100 man-hours in reviewing procedures, performing walkdowns, and conducting interviews with personnel to ensure that the programs at CPS implement the actions requested in this bulletin.

I hereby affirm that the information provided in this letter is correct to the best of my knowledge.

Sincerely yours,

  
J. S. Perry  
Senior Vice President

JSP/WTD/nls

cc: NRC Clinton Licensing Project Manager  
NRC Resident Office, V-690  
Regional Administrator, Region III, USNRC  
Illinois Department of Nuclear Safety