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RECORD OF CORRECTIONS

Advance ChangeEnteredDateNoticeDateAffected Pages(Initials)Entered

Change

*

Date

Affected Pages

Entered Date (Initials) Entered

LIST OF EFFECTIVE PAGES

Title	Page No.	Change
Letter of Promulgation	i	0
Table of Contents	ii, iia	0
Record of Corrections	iii	0
List of Effective Pages	iv	0
Section 1	1-1 through 1-3	0
Section 2	2-1 through 2-6	0
Section 3	3-1 through 3-2	0
Section 4	4-1 through 4-9	0
Section 5	5-1 through 5-2	0
Section 6	6-1 through 6-3	0
Section 7	7-1 through 7-4	0

Introduction and Policy

1.0 Introduction

Clinton Nuclear Power Station is a 985 MWe BWR-6 Boiling Water Reactor plant with a Mark III containment under construction in a joint effort by Illinois Power Company, Soyland Power Cooperative, Inc., and Western Illinois Power Cooperative, Inc.

The nuclear steam supply system was designed by General Electric Company and the balance of the plant was designed by Sargent and Lundy. The constructor is Baldwin Associates (BA). As of October 31, 1982 the plant was about 85% complete with fuel load scheduled for January, 1984 and commercial operation in August, 1984. Construction costs are estimated to be \$2,170,086,000. Cost and schedule estimates are being revised at this time.

This Manual represents the management control system that will be used in accomplishing the Illinois Power Company Nuclear Power Program.

The Nuclear Power Program Management Manual contains goals, commitments and schedules supporting achievement of nuclear program objectives. Departments shall formulate plans for achieving nuclear program objectives and report status against these commitments.

1.1 Tasks

The Illinois Power Company Nuclear Power Program has the following tasks assigned in support of Company goals.

- 1.1.1 Complete Clinton Nuclear Power Station at the earliest possible time.
- 1.1.2 Complete the nuclear regulatory licensing process in appropriate sequence with construction completion.
- 1.1.3 Enter Clinton Nuclear Power Station into commercial operation at the earliest possible time.

1.2 Goals

To accomplish these tasks the following Nuclear Power Program goals are established.

- 1.2.1 Continue efforts to ensure that the Clinton plant is completed with the highest possible assurance level of quality construction.
- 1.2.2 Demonstrate in day to day events that top level management and all levels of supervision support fully a strong, effective quality assurance program which will ensure quality construction, testing and operation.
- 1.2.3 Encourage hiring and retention of high quality personnel.
- 1.2.4 Prepare and implement a schedule supporting early completion of Clinton Nuclear Power Station.

1.3 Strategy

Accomplishing these goals is most easily achieved with a program separated into a short and long range strategy. Further separation of the short and long range strategy elements into discrete parts which lead to well coordinated construction, test and operational programs is essential. The following short and long range strategy programs are established.

- 1.3.1 Complete the Illinois Power Company Improvement Program. (Section 4)
 - 1.3.1.1 Complete the Quality Recovery Program
 - Institute an interim planning and scheduling system which includes construction work and correction of problems. The schedule should identify resources to support the established schedule.
 - Establish and implement a corrective action system.
 - c. Complete an evaluation of both BA and IPC quality assurance staffs to ensure adequacy of the resources to support the established schedule.

- d. Establish and implement a QA audit and surveillance program to verify the Quality Recovery Program.
- e. Implement a work control system (Traveler Tracking System).
- Define and clear the inspection backlog, including corrective action program items.
- g. Disposition and complete appropriate action for all currently outstanding NCRs/DRs.
- h. Clear Stop Work Orders
- 1.3.1.2 Complete the Verification Program to assure the quality of construction work already complete.
- 1.3.1.3 Complete the Nuclear Program Management Plan comparing regulatory requirements and best industry practices to present practice.
- 1.3.1.4 Complete the Training Recovery Plan to assure qualified personnel are available to continue construction.
- 1.3.2 Complete the following long term efforts in support of Illinois Power Company Goals.
 - 1.3.2.1 Implement the findings of the Nuclear Program Management Plan. Adjust organization and management systems to ensure optimum operation within Illinois Power Company. (Section 6)
 - 1.3.2.2 Establish a schedule and management system to support the earliest possible achievement of commercial operation.
 - Update the construction schedule. (Section 5)
 - Update department schedules to support system turnover, the licensing process and commercial operation. (Section 6)

1-3

Organization and Responsibility

2.0 Organization and Responsibility

The organization and responsibilities for executing the IPC Nuclear Power Program have been established as follows.

- 2.0.1 W. C. Gerstner, Executive Vice President, is responsible for all nuclear power program activities.
- 2.0.2 D. P. Hall, Vice President, is responsible for Quality Assurance, Nuclear Station Engineering, Clinton Nuclear Power Station operation, start-up activities and implementation of the IPC Nuclear Power Program defined in this Manual. Mr. Hall reports to W. C. Gerstner, Executive Vice President.
- 2.0.3 J. H. MacKinnon, Project Manager, is responsible for Clinton site construction. In this capacity, he directs IPC and Baldwin Associates contractor and sub-contractor activities associated with all phases of construction work. He is responsible for construction planning and scheduling. Mr. MacKinnon reports to W. C. Gerstner, Executive Vice President.
- 2.0.4 J. D. Geier, Manager, Nuclear Station Engineering Department, is responsible for Clinton Nuclear Power Station Engineering activities. Mr. Geier reports to D. P. Hall, Vice President.
- 2.0.5 T. F. Plunkett, Manager, Clinton Nuclear Power Station, is responsible for the station operation and start-up. Mr. Plunkett reports to D. P. Hall. Vice President.

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2-1

- 2.0.6 W. Connell, Manager, Quality Assurance, is responsible for Illinois Power Company Quality Assurance activities. He reports to D. P. Hall, Vice President.
- 2.0.7 J. E. Findley, Manager, Quality and Technical Services, is responsible for Quality Assurance and Technical Services for Baldwin Associates. He reports to D. P. Hall, Vice President.
- 2.0.8 L. S. Brodsky, Director, Nuclear Programs, is responsible for direction of the Nuclear Program Management Plan. He reports to D. P. Hall, Vice President.
- 2.0.9 A. J. Budnick, Director, Evaluation and Improvement, is responsible for direction of assigned Clinton site improvement programs. He reports to D. P. Hall, Vice President.
- 2.0.10 The organization chart reflecting these responsibilities is on page 2-3.
- 2.1 Specific Responsibilities

Specific responsibilities for the program elements of the IPC Nuclear Power Program are as follows:

2.1.1 Quality Recovery Program

2.1.1.1 Work Control

B. F. Gallagher reporting toJ. H. MacKinnon

Clear Inspection Backlog

SWO 007 Electrical Cable Tray and Attachments

SWO 010 Drywell and Refueling Bellows

SWO 014 Safety Related HVAC



2-3

SW	C	01	15	At	ta	cł	ımer	nt	of	
Se:	is	m	ic	HV	AC	F	lang	ger	s	
to	S	a	fe	ty	St	ru	icti	ire	s	

SWO 016 Electrical Conduit

SWO 017 Electrical Equipment

SWO 018 Electrical Instrumentation

SWO 019 Containment Structural Steel

SWO 020 All HVAC Work in Category I Buildings

SWO 021 Test of Containment Gas Control Boundary (Complete)

Corrective Action

QA Effectiveness

2.1.1.2 Procurement

Plan

Plan

Training Recovery Plan

Verification Program

2.1.1.3

2.1.1.4

2.1.2

2.1.3

H. E. Daniels reporting to J. H. MacKinnon

C. A. Smiroldo reporting to W. Connell

G. W. Bell reporting to W. Connell

A. J. Budnick reporting to D. P. Hall

2.1.3.1Overinspection
ProgramR. L. Baldwin
reporting to
W. Connell2.1.3.2RecordsR. A. Derbort
reporting to
D. P. Hall

2.1.4	Nuclear	Program	Management	Plan	L.	s.	Brodsky
					re	por	ting to
					D.	Ρ.	Hall

2.1.5 Departmental Plans

As described in 2.0

2.2 Nuclear Power Program Management Manual

The following procedures are effective to assure standard methods are used to administer this Manual.

2.2.1 Definitions

- 2.2.1.1 Advanced Change Notice (ACN) a correction that does not change the intent, that is limited in scope, and that may have limited distribution.
- 2.2.1.2 Change a correction of general interest but limited to updating specific sections of the Manual.
- 2.2.1.3 Revision a major correction involving programmatic changes. A revision shall reissue the entire Manual.

2.2.2 Advanced Change Notices

2.2.2.1 ACNs shall be numbered sequentially "ACN n/m": where n is the sequence number of the ACN and m is the number of the change that will incorporate the ACN. For example, the first ACN subsequent to a revision is ACN 1/1 this indicates that it is the first ACN and will be incorporated in Change 1. 2.2.2.2 Departments may initiate ACNs in any convenient manner when urgency dictates. ACN numbers are under the control of the Nuclear Programs Department. The Vice President shall approve ACNs and new pages shall be prepared with "ACN n/m" in the outer margin adjacent to the corrections. Formal changes shall incorporate all ACNs with the appropriate numerical subscript (m).

2.2.3 Changes

- 2.2.3.1 Changes shall be numbered sequentially and the numbers are under the control of the Nuclear Programs Department. Departments shall initiate changes for the approval of the Vice President.
- 2.2.3.2 New pages shall be issued for each affected page with CH# in the outer margin adjacent to corrections.

2.2.4 Revisions

Revisions shall be numbered sequentially, shall reissue the entire Manual, and shall be approved by the Vice President. Revisions should incorporate all outstanding changes and ACNs; at this point changes and ACN numbering start over again.

Nuclear Power Program Milestones

3.0 Milestones to Achieve Commercial Operation

The major Nuclear Program milestones necessary to achieve Commercial Operation are presented in Figure 3-1. Subsequent sections develop in more detail the schedule needed to support completion of these events. The dates to achieve these milestones are under review and will be revised in accordance with the schedules in Sections 5 and 6.

19	82	2 1983										1984												
NOV.	DEC.	JAN F	EB. MAR	APR.	MAY	JUN.	JUL	AUG.	SEP.	OCT.	NOV.	DEC	JAN.	FEB	MAR	APR.	MAY	JUN.	JUL.	AUG.	SEP.	OCT.	NOV.	DEC.
-14	-13	-12 -	11 -10	-9	- 8	-7	-6	-5	-4	- 3	-2	- 1	0	+1	+2	+ 3	+4	+5	+6	+7	+8	+9	+10	+11
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FIGURE 3-1

Illinois Power Company Improvement Program

4.0 Background

This section contains the Illinois Power Company Improvement Program which is a short term effort prepared to improve specific areas.

Since January, 1982, a number of fundamental issues have been identified in the Illinois Power Company Nuclear Power Program. These fundamental issues are summarized as follows:

- 4.0.1 Audits have identified concerns related to the quality of completed work.
- 4.0.2 Work control requires improvement so that inspection is completed at the same rate as construction.
- 4.0.3 Corrective action systems need to be welldefined, centrally managed and implemented in a timely fashion.
- 4.0.4 Improvements in program activity coordination and management systems are necessary to enhance organizational performance.
- 4.0.5 The transition from construction to start-up and operation requires additional definition to enhance effectiveness.

4.1 Objectives

Illinois Power Company's program to resolve these issues has been prepared to provide assurance that all requirements are met to manage, construct, operate and maintain a nuclear power plant properly. This in turn requires ensuring that an organization is in place which will function within a defined system of responsibility and accountability. Implicit in this effort is a system of coordinated management functioning to control an integrated system of organizational elements, e.g., construction, engineering, start-up, operations, quality assurance, etc.

- 4.1.1 The quality of completed work and documentation will be verified.
- 4.1.2 Work controls will be implemented (and monitored) that will allow the inspection backlog to be reduced and a controlled return to full construction will be accomplished.
- 4.1.3 Deficiency correction systems will be improved, better defined and centrally managed.
- 4.1.4 An integrated program schedule will be developed (based on the construction schedule) and management direction will assure an orderly transition from construction to start-up and operation. Management systems and organizational structure will be evaluated, integrated and improved where necessary.

4.2 Elements

The Illinois Power Company Improvement Program will be implemented through three primary program elements: the Quality Recovery Program, Verification Program and the Nuclear Program Management Plan.

- 4.2.1 Quality Recovery Program
 - 4.2.1.1 The work control section of this program will develop a traveler control system, define and reduce the inspection backlog and ensure timely inspection of completed work. The backlog of nonconformance reports and deviation reports will be reduced. Figure 4-1 contains the major milestones for these programs.

- 4.2.1.2 The Quality Recovery Program will assure corrective action is complete for lifting the following Stop Work Orders.
 - SWO 007 Electrical Cable Tray and Attachments
 - SWO 010 Drywell Refueling Bellows
 - SWO 014 Safety Related HVAC
 - SWO 015 Attachment of Seismic HVAC Hangers to Safety Structures
 - SWO 016 Electrical Conduit
 - SWO 017 Electrical Equipment
 - SWO 018 Electrical Instrumentation
 - SWO 019 Containment Structural Steel
 - SWO 020 All HVAC Work in Category I Buildings

Figure 4-2 contains the major milestones for these programs.

4.2.1.3 The effectiveness of these actions will be evaluated by a revised corrective action plan and the quality assurance effectiveness plan. The milestones for these program elements and for the training recovery plan are included in Figure 4-3. The milestones for the Procurement Recovery Program are included also.

4.2.2 Verification Program

The Verification Program verifies the quality of completed safety related construction work and the documentation of this work. The Overinspection Program and the Record Verification Program milestones are included in Figure 4-4.

4-3

4.2.2.1 Overinspection Program

The quality of construction work completed prior to July, 1982 will be verified by the procedures established in the overinspection program. Completion of overinspection program events is scheduled in the construction schedule to ensure resource balancing.

4.2.2.2 Record Verification Program

The records of construction work completed prior to July, 1982 will be verified (100%) during completion of this program.

4.2.3 Nuclear Program Management Plan

This Plan will develop an integrated program schedule, an organizational transition plan and coordinate preparation of corporate nuclear procedures. A summary schedule for the Nuclear Program Management Plan is included in Figure 4-5.



FIGURE 4-1



4-6





FIGURE 4-4



Construction Schedule Update

5.0 Construction Schedule Update

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5.0.1 The construction schedule must be updated to establish a clear path to completion for the Clinton Nuclear Station. This effort is presented in the milestones of Figure 5-1.



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FIGURE 5-

Update Department Schedules

- 6.0 Department schedules supporting the licensing process must be updated to establish current integrated milestones which will lead to a smooth transition from construction to commercial operation. The schedule for completing this effort is indicated in Figure 6-1.
- 6.1 Clinton Station Management
 - 6.1.1 Plant Operations
 - 6.1.2 Technical
 - 6.1.3 Security
 - 6.1.4 Emergency Preparedness
 - 6.1.5 Radiation Protection
 - 6.1.6 Chemistry
 - 6.1.7 Radwaste
 - 6.1.8 Maintenance
 - 6.1.9 Support

6.2 Engineering/Licensing

6.2.1	Licensing
6.2.2	Design Engineering
6.2.3	Nuclear Safety & Engineering Analysis
6.2.4	Support

6.3 Quality Assurance

i,

6.4

6.3.1	Programs and Procedures
6.3.2	Audits and Surveillance
6.3.3	Quality Engineering
6.3.4	Quality Control
6.3.5	Support
Corporate	Organization

- 6.4.1 Nuclear Programs
- 6.4.2 Support



6 - 3

FIGURE 6-1

Chronology/History

7.0 Project Schedule Events

7.0.1	Unit 1	Scheduled	Actual
	Authorized	2/10/72	-
	Award NSSS		12/28/72
	Submit PSAR & ER	6/73	7/23/73
	Construction Permit	Late 1975	2/24/76 (LWA 10/3/75)
	Construction Start	10/03/75	10/03/75
	File FSAR & FER	6/78	12/79
	FSAR & FER Docketed		9/08/80
	ASLB Hearings	To Be Schedul	ed
	Operating License	1/84*	
	Fuel Load	1/84*	
	Commercial Operation	8/31/84*	
	*Schedule current1	y in review.	

7.0.2 Unit 2 Deferred

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7.1 Licensing Schedule (as of 1/28/83)

FSAR Submitted to NRC December 1, 1979 FSAR Docketed September 8, 1980 Amendment 1 Filed - Chapter 7 November 14, 1980 Amendment 2 Filed - CPS Acceptance December 30, 1980 Questions Amendment 3 Filed - Grand Gulf 1st Round Questions (FSAR Changes) April 30, 1981 Grand Gulf 1st Round Questions and Responses Filed May 26, 1981 Amendment 4 Filed - Mechanical Engineering Branch Draft Safety Evaluation Report May 29, 1981 Amendment 5 Filed - Grand Gulf 1st Round Questions (FSAR Changes) July 20, 1981 Amendment 6 Filed - Voluntary Update of FSAR August 27, 1981 Amendment 7 Filed - Responses to NRC Questions: Emergency Plan; TMI Appendix September 30, 1981 Amendment 8 Filed - Responses to NRC Questions October 30, 1981 Amendment 9 Filed - Responses to NRC Ouestions November 17, 1981 Amendment 10 Filed - Responses to NRC Questions November 30, 1981 Meetings to Resolve Open Issues with November 30 --NRC December 4, 1981 Amendment 11 Filed - Voluntary Update of FSAR December 30, 1981 Amendment 12 Filed - Environmental Qualification Data January 29, 1982 ACRS Meeting (Subcommittee) February 25, 26, 1982 Amendment 13 Filed - Chapter 14 Revision February 26, 1982 SER Issued February 1982 ACRS Meeting (Full Committee) March 5, 1982

Amendment 14 Filed - Voluntary Update of FSAR March 31, 1982 Amendment 15 Filed - Voluntary Update of FSAR April 30, 1982 Amendment 16 Filed - Information on Emergency Preparedness May 28, 1982 Supplemental SER Issued June 30, 1982 Amendment 17 Filed - Section 17.2 Revision (Quality Assurance) July 20, 1982 Amendment 18 Filed - SER Issues Update of FSAR September 30, 1982 Amendment 19 Filed - Section 3.11 Revision (Environmental Qualification) October 27, 1982 Amendment 20 Filed - New Loads Information October 29, 1982 Amendment 21 Filed - Update FSAR P&ID's December 29, 1982 Operating License - Fuel Load Date January 1, 1984 Commercial Operating Date August 31, 1984 7.2 Outstanding Issues (as of 1/28/83) (Safety Evaluation

Report numbers cited)

Transportation Accidents (2.2) Seismic Analysis (2.5.2, 3.7.1, 3.7.2) Postulated Piping Failures in Fluid Systems Outside Containment (3.6.1, 3.6.2) Steady-state Vibration Acceptance Criteria for BOP Piping (3.9.2)** Environmental and Seismic Qualification Test Programs (3.9.3.2, 3.10, 3.11)Pool Dynamic Loads (6.2.1.8) Containment Purge, Isolation, Bypass Leakage, and Leakage Testing (6.2.4, 6.2.6, 6.4, 15.3.1, 6.2.2) Engineering Safety Feature Reset Controls (I&E Bulletin 80-06) (7.3.3.5)

Remote Shutdown System (7.4.3.1, 9.5.5) Capability for Safety Shutdown Following Loss of Bus Supplying Power to Instruments and Controls (I&E Bulletin 79-27) (7.4.3.2) Control System Failures Resulting from High Energy Line Breaks or Common Power Source or Sensor Malfunctions (7.7.3.1) Organization & Staffing (13.1.2.2, 13.6.3) Emergency Plan (13.3) QA Program (17)

** Believed Closed

7.3 License Conditions (as of 1/28/83)

There are several issues for which a condition will be included in the Operating License to ensure that NRC requirements are met during plant operation. Other license conditions will be defined at a later time.

Staffing DeWitt Pumping Station (2.2)*
New Stability Analysis Before Second Cycle of
Operation (4.4)
Postaccident Monitoring (7.5.3.1)
Vacuum Relief Valve Position Indication (7.3.2.3)
Hydrogen Management - 5% Power (6.2.7)
Postaccident Sampling - II.B.3 (9.3.4)
Diesel Generator Reliability (9.6.3.1)
Kuosheng 1 Test Program (3.9.2, 6.2.1.8.2)
Visual Examination of Discharged Fuel (4.2.3.9)
Measurement of Groundwater Level (2.4.6)
Security (13.7)

* Believed Closed

7.4 Environmental Report (as of 1/28/83)

Site Visit	April 27, 28, 1981
NRC Questions Received	May 28, 1981
IP Responds	June 22, 1981
DES Issued	December 1981
Federal Register Announcement	February 8, 1982
End of Comment Period	February 22, 1982
IP Responds	March 24, 1982
FES Issued	May 1982
Public Hearing	April 1983

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