



Illinois Power Company
Clinton Power Station
P.O. Box 678
Clinton, IL 61727
Tel 217 935-8881

U-602544
L30-96(01-31)LP
1A.120

January 31, 1996

Docket No. 50-461

Document Control Desk
Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Clinton Power Station's Request to Modify the
National Pollutant Discharge Elimination System Permit

Dear Sir:

In accordance with the Environmental Protection Plan, Appendix B to the Facility Operating License (License No. NPF-62), Illinois Power is submitting the attached requests to modify the National Pollutant Discharge Elimination System (NPDES) Permit for Clinton Power Station. These requests have been submitted to the Illinois Environmental Protection Agency for consideration.

Sincerely yours,

Michael W. Lyon
Director-Licensing

GBS/csm

Attachment

cc: NRC Clinton Licensing Project Manager
NRC Resident Office, V-690
Regional Administrator, Region III, USNRC

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November 7, 1995

Stephen F. Nightingale, P.E.
Manager, Industrial Unit, Permits Section
Division of Water Pollution Control
Bureau of Water
Illinois Environmental Protection Agency
P.O. Box 19276
Springfield, IL 62794-9276

Dear Mr. Nightingale:

**Re: Clinton Power Station;
NPDES Permit IL0036919;
Request to Modify Outfall 007 TRC Monitoring Requirement**

As I discussed with Darin LeCrone on November 7, the NPDES permit for the station (reissued by the Agency on September 21 of this year) requires the concentration of total residual chlorine (TRC) to be monitored continuously in the SX discharge (outfall 007) to Clinton Lake. IP is requesting herein that this monitoring frequency be changed to once-weekly so that TRC monitoring at this outfall is consistent with the TRC monitoring at the station's chlorinated condenser cooling water discharge at outfall 002 and the chlorinated cooling water discharges at IP's coal-fired power plants. In addition, IP believes it will only be necessary to collect a single grab sample of the SX system discharge to the lake during this once-weekly monitoring event in order to demonstrate compliance with the 0.05 mg/l TRC limitation that the Agency has established for this outfall. IP believes a single grab sample collected once-weekly of the discharge will be adequate for the following reasons.

First, amperometric titration TRC monitoring will be used for determining compliance with the permit limitation; however, it will not be the only analytical method utilized at this outfall to detect the presence of residual chlorine (oxidant) in the SX discharge. An oxidation-reduction potential (ORP) instrumentation system will be installed in the dechlorination facility currently under construction at this outfall. This ORP monitoring system will continuously sense the concentration of residual oxidant in the discharge to Clinton Lake and will continuously adjust the mass of sodium bisulfite injected into the SX discharge so as to continuously reduce residual oxidant concentrations to less than 0.05 mg/l. The once-weekly TRC amperometric titration monitoring will complement the continuous ORP monitoring.



Illinois Power Company
500 South 27th Street
P O Box 511
Decatur, IL 62525-1805

September 29, 1995

Darin LeCrone
Industrial Unit, Permits Section
Division of Water Pollution Control
Bureau of Water
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62794-9276

Dear Mr. LeCrone:

**Re: Clinton Power Station;
Reissued NPDES Permit IL0036919
Suggested Editorial Changes**

IP has reviewed the reissued NPDES permit for the station, dated September 21, 1995, and has noted that it contains several typographical errors. The original reissued permit is enclosed and the typographical errors are noted on the original. Would you please correct these errors and then send us a new original copy of the permit.

Sincerely yours,

A handwritten signature in cursive script that reads "Thomas L. Davis".

Thomas L. Davis
Sr. Environmental Professional
Environmental Resources Department
Mail Code - A-17

Enclosure

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Stephen Nightingale
November 7, 1995
Page 2

And second, station personnel do not expect the rate of sodium hypochlorite injected into the SX system to vary significantly during a week. Sodium hypochlorite injection rates will be adjusted based on system flows and seasonal chlorine demands to maintain a constant total residual chlorine concentration throughout the SX piping system. Once this constant seasonal residual chlorine concentration level is established, it should change little during the week.

If the Agency agrees to this proposed TRC monitoring modification for outfall 007, then it will be necessary to change the monitoring information for outfall 007 in the body of the permit, and the narrative information of special condition no. 14.D. in the September 21 reissued permit. Similarly, IP submitted a number of comments (mostly of an editorial nature) to the Agency on the reissued permit on September 29. One of those comments was related to the TRC monitoring requirement of special condition no. 3. That specific comment should be disregarded if the Agency agrees to this proposed modification.

I would be happy to discuss this issue with you personally if you believe that is necessary. My telephone number is 217-424-6833. Please feel free to call me at your convenience.

Sincerely yours,

ILLINOIS POWER COMPANY

Thomas L. Davis For

Brett J. Marshall
Group Leader - Water
Environmental Resources Department
Mail Code - A-17

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