



Illinois Power Company
Clinton Power Station
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U-602557
L30-96(02 -27)LP
1A.120

February 27, 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 notifying you of our request to modify the National Pollutant Discharge Elimination System (NPDES) Permit for Clinton Power Station. This request has been submitted to the Illinois Environmental Protection Agency for consideration, and a copy of the request is attached.

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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O-601705
L60-96 (02-16)-LP
8F.120

February 16, 1996

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

Mr. Nightingale:

**Clinton Power Station;
Proposed Modification of NPDES Permit IL0036919, Outfall 002;
Requested Authorization to Use Betz Clamtrol™ for Zebra Mussel Control**

In its July 25, 1995 comments on the public notice draft of the reissued NPDES permit for the station, IP requested authorization to use Betz Clamtrol CT-2™ for controlling zebra mussels in the condenser cooling water system of the station. At that time, the NPDES permit was expired and only chlorination of the condenser cooling water flow was authorized by the IEPA for macroinvertebrate control.

On September 21, 1995 the IEPA reissued the NPDES permit for the station. Chlorine and chlorine dioxide were authorized by the IEPA in the reissued permit for controlling macroinvertebrates in the condenser cooling water system. However, the authorization to use Betz Clamtrol CT-2™ in the condenser cooling water system was denied. In item no. 1 of the cover letter of reissued permit, the Agency indicated that, for the IEPA to authorize the use of this chemical, IP must submit information on its intended usage, including injection dosage concentration, injection duration, expected discharge concentration, etc.

Since the time of the reissuance of the station's NPDES permit, two events have occurred which now makes IP renew its request for authorization to use the Betz ClamTrol product at the Clinton Power Station. First, IP has learned that USEPA is no longer approving the injection of chlorine dioxide at dosage concentrations in cooling water systems that would be effective in destroying zebra mussels.

Therefore, the chlorine dioxide treatment option, which IP was relying upon for zebra mussel control at the Clinton Station, may no longer be acceptable. Second, IEPA has drafted the reissued NPDES permit for the Wood River Station (IL0000701) and in that draft permit IEPA has authorized the use of the ClamTrol product for controlling zebra mussels in the cooling water systems at that station.

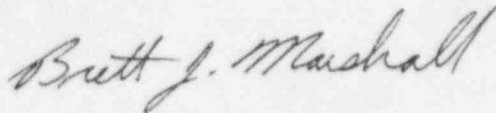
Special condition No. 11 of the draft reissued Wood River Station NPDES permit states:

"The usage of Betz ClamTrol shall be conducted in accordance with USEPA recommendations, and IEPA's July 21, 1995 letter to Illinois Power. The methyl orange analytical method for surfactants shall be used to document that no detectable residual n-alkyl dimethyl benzyl ammonium chloride (ADBAC) exists after detoxification. Measurement shall be required at 8-hour intervals and analysis shall be conducted immediately after collection of a grab sample".

As IP would use the Betz Water Management Group to conduct zebra mussel treatments at the Clinton Station, and as IP is already aware of the requirements stipulated by the IEPA in its July 21, 1995 letter, IP feels justified in requesting the same special condition be added to the Clinton Power Station NPDES Permit.

Please feel free to call me (424-6833) or Tom Davis (424-7322) if you have questions about our requested modification.

Sincerely yours,



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

BJM/BJM96007.WPD:srb

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