ILLINOIS POWER COMPANY



CLINTON POWER STATION, P.O. BOX 678, CLINTON, ILLINOIS 61727

January 8, 1988

Docket No. 50-461

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

Subject: Clinton Power Station Environmental Monitoring

Dear Sir:

Illinois Power (IP) developed a lake water intrusion monitoring program about ten years ago to fulfill a commitment in Section 5.2.2 of the October, 1974 Final Environmental Statement. The purpose of this program was to monitor for lake water intrusion into the wells. A number of private and municipal wells (ten in all) surrounding the Clinton Power Station site have been monitored during the past nine years according to the program plan.

Section 5.3.2.1 of the Final Environmental Statement - Operating License Stage (FES-OL), May, 1982 required this monitoring to continue, but for a different purpose, to determine the impact on groundwater quality due to possible leaching from the wastewater treatment ponds (WWTP). In March, 1985, Illinois Power discussed with the NRC IP's concern about the wording in Section 5.3.2.1 of the FES-OL. The lake water intrusion wells are not located in the localized groundwater system beneath the WWTP and, therefore, cannot be used to monitor leachate, if any, from the WWTP. The primary aquifer beneath the WWTP is a localized, confined aquifer in which the groundwater is under artesian pressure. The low permeability of the soil beneath the WWTP will inhibit the migration of leachate to the groundwater. The impact on Clinton Lake will be insignificant.

The effluent from the WWTP system (and filter house) has always been regulated by a National Pollutant Discharge Elimination System (NPDES) permit which is administered by the Illinois Environmental Protection Agency (EPA) including effluent monitoring requirements unique to this outfall to the lake. In addition, the Illinois EPA granted a groundwater monitoring waiver for operation of the WWTP as an elementary neutralization facility under the Illinois Resource Conservation and Recovery Act (RCRA) regulations.

The WWTP is no longer used as an elementary neutralization facility, and the Illinois EPA authorized closure of the WWTP as a RCRA facility on May 19, 1987. The Illinois EPA will continue to regulate the WWTP through its permitting and surveillance programs under NPDES.

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For these reasons. Illinois Power believes that the monitoring of the lake water intrusio: wells can be discontinued and hereby requests the NRC's concurrence. The monitoring does not serve the purpose for which it was intended; the WWTP is regulated by the Illinois EPA as an NPDES facility, and the use of the WWTP as an elementary neutralization RCRA facility has stopped.

If you have any questions on this issue, please corract me.

Sincerely yours,

F. A. Spangenbarg, III Manager - Licensing and Safety

DWW/krm

cc: B. L. Siegel, NRC Clinton Licensing Project Manager NRC Resident Office Regional Administrator, Region III, USNRC Illinois Department of Nuclear Safety