ILLINOIS POWER COMPANY



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

SEP 17 1986

Docket No. 50-461

Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation United States Nuclear Regulatory Commission Washington, DC 20555

Subject: Clinton Power Station

Initial Test Program Activities Projected for Completion After

Fuel Load - Revised Completion Milestone

Dear Mr. Denton:

In Illinois Power Company (IP) Letter U-600469,
"Initial Test Program Activities Projected for Completion
After Fuel Load," dated March 12, 1986, IP requested to
defer some preoperational tests and included the technical
justifications for those deferrals. In that letter, IP
requested the preoperational phase test program deferral for
the Solid Radwaste System (WX) with a completion milestone
prior to Heatup. The purpose of this letter is to provide
your Staff with the technical justification for deferring
the WX System preoperational testing until prior to
Commercial Operations. This technical justification
supports the conclusion that the deferred portion of the
test will not affect the safe operation of the plant nor put
an excess burden on the plant operators or Startup
personnel.

If you have any questions or comments concerning the information provided herein, please contact me or Frank Spangenberg of my staff.

Sincerely yours,

Vice President

TLR/ckc

Attachment

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cc: Director, Office of Inspection and Enforcement, USNRC R. M. Bernero, Director, Division of BWR Licensing Dr. W. R. Butler, Director, BWR Project Directorate #4 B. L. Siegel, NRC Clinton Licensing Project Manager NRC Resident Office Regional Administrator, Region III USNRC Illinois Department of Nuclear Safety

Attachment 1 Initial Test Program Item Remaining to be Completed After Fuel Load Solid Radwaste System

Chapter 14 of the Clinton Power Station Final Safety Analysis Report (CPS-FSAR) describes the basic elements of the CPS Initial Test Program. The initial test program covers the testing of structures, systems and components. The overall objectives of the initial test program are described in Chapter 14 of the FSAR and were discussed in IP Letter U-600469, dated March 12, 1986. In that letter, IP requested to defer the preoperational phase testing of the Solid Radwaste System (WX) until prior to Heatup. following 1) describes the requested test deferral milestone extension; 2) defines the proposed test completion milestone; and 3) presents the technical justification for the deferral extension of this test item. On the basis of this technical justification, the proposed test item can be deferred without undue risk to public health and safety, can be completed without undue interference with post Fuel Load operations and testing, will not impact plant operating procedures, and can be accomplished without exception to the CPS Technical Specifications (TS).

Solid Radwaste System (WX)

Request - Deferral of the WX System preoperational phase test (i.e., demonstration of trash compacting and handling equipment and integrated system performance testing) until after Fuel Load.

Completion Milestone - prior to Commercial Operations.

Technical Justification - The WX System is sized for two units; it consists of two trains, each capable of serving one unit. The design and operation configuration allows for separation of the equipment into two distinct subsystems. An interim modification of one train was recently completed to provide assurance that waste slurries can be transferred to the solidification vendor with a minimum of extra effort. This extra effort includes more time in transferring waste due to low pump flow rates as well as additional transfers needed due to lower slurry concentrations than originally intended in the design. However, in order for the system to pass the integrated system test, a more extensive modification must be accomplished on both trains. This design modification, WX-09, involves replacing the existing 100gpm sludge transfer pumps with a different type of pump capable of pumping 300gpm, making piping modifications to install the new pumps, and replacing the sampling system with a local grab station. This design modification will be implemented on one train at a time. Therefore, while one of

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the subsystems is being modified, the other is capable of collecting, decanting, and transferring waste to the vendor-supplied, portable solid radwaste system. The integrated system test will be performed after modification of both trains. However, due to a delay in equipment procurement, the schedule for completion of this modification, including testing of the integrated system, is January 1987.

All initial tests on the existing system are complete except the integrated system performance testing. As a result, deferral of the preoperational test to commercial operations will not prevent satisfactory operation of the system or subsystems.

Additional Information

- ° Deferred Test Activity: Preoperational Test PTP-WX-01
- ° FSAR Chapter 14.2.12.1.15
- Safety-Related System: NoTech. Spec. exception: No