

ILLINOIS POWER COMPANY



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

September 5, 1986

Docket No. 50-461

Director of Nuclear Reactor Regulation
Attention: Dr. W. R. Butler, Director
BWR Project Directorate, No. 4
Division of BWR Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Clinton Power Station
Emergency Preparedness Exercise Waiver Request

Dear Dr. Butler:

The Clinton Power Station (CPS) 1986 Emergency Preparedness Exercise is currently scheduled for October 28, 1986. NRC regulations in 10CFR50, Appendix E, Part IV.F, identify requirements for performance of and participation in Emergency Preparedness Exercises. The purpose of this letter is to request a waiver to the NRC regulatory requirements, identified in 10CFR50, Appendix E, Parts IV.F.1 and IV.F.2. The reference regulatory requirements specify the following:

1. 10CFR50, Appendix E, Part IV.F.2

"Each licensee at each site shall annually exercise its emergency plan."

The need for IP's proposal to defer the 1986 Emergency Preparedness Exercise is based on a request to delay the exercise by the Clinton/DeWitt County Emergency Services and Disaster Agency (ESDA). The request is based upon (1) the County ESDA move to new offices in the new Clinton City Hall Building, (2) the November general elections (anticipate a new DeWitt County Sheriff and potentially other new government officials who should be trained via Exercise participation), and (3) the lack of County ESDA budget appropriations (one exercise per fiscal year). IP wishes to support performance of this Exercise in a manner supportive of the DeWitt county ESDA needs. In particular, IP considers this training for the newly elected count officials to be important. These officials would not otherwise participate until the fall of 1988. Thus a waiver to the Part IV.F.2 requirement would be needed in that no exercise in 1986 is to be conducted (deferred until January 13, 1987).

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2. 10CFR50, Appendix E, Part IV.F.1

"A full participation exercise....shall be conducted within 1 year before the issuance of the first operating license for full power and prior to operation above 5% of rated power of the first reactor, and shall include participation by each State and local government...."

Currently, IP plans on receiving the fuel load license at CPS by the end of September. The CPS power ascension schedule currently establishes completion of low power testing and readiness to proceed above 5% power within approximately two months (early December timeframe) after issuance of the fuel load license. The previous CPS Exercise was conducted on December 4, 1985. This previous Exercise was a full participation Exercise for the State of Illinois, DeWitt County, and the Village of Clinton, and a partial participation Exercise for the Counties of Macon, McLean and Piatt, and the municipalities of DeWitt Village, Weldon and Wapella. Therefore, based on the current CPS power ascension schedule and the date of the next full-participation Exercise, a full-participation Exercise may not be conducted at CPS in accordance with Part IV.F.1 above (i.e., within 1 year of issuance of the full power license). Thus, a waiver to this requirement is requested. Should the Staff grant this waiver request, the next full participation Exercise is planned for January 13, 1987.

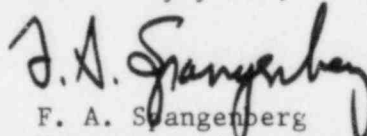
IP considers the proposed waiver requests justified based on the need for County ESDA support and the following:

1. The NRC Inspection Report (50-461/85039, December 24, 1985) covering the December 4, 1985, joint full-participation Exercise identified no violations of NRC requirements and six open I&E inspection items. Two of the six I&E items required resolution before fuel load; both of these two items were resolved in a subsequent inspection (50-461/86021). Of the remaining 4 I&E items, all must be resolved prior to Commercial Operations. IP action is complete on two of these and actions on the other two will be examined during the next Exercise.
2. The interim finding by FEMA on the offsite radiological preparedness plans for Clinton was dated March 12, 1986, and was forwarded to the NRC by memorandum dated April 4, 1986. The interim finding was based on FEMA's Region V review of the Illinois Plan for Radiological Accidents, State General Plan (Volume I) and the preliminary site-specific plan for Clinton (Volume VIII), an analysis of the State's schedule of corrective actions for the planning inadequacies identified in the Regional Assistance Committee review, and an evaluation (FEMA letter dated June 20, 1986) of the initial joint full-participation Exercise conducted on December 4, 1985. FEMA found reasonable assurance that the health and safety of the public can be protected in the event of an incident at Clinton.

3. The proposed date for the next full-participation Exercise is only about 1½ months beyond the required timeframe necessary to be in literal compliance with 10CFR50, Appendix E, Part IV.F.1. Finally, although a 1986 Exercise is not proposed, the next planned Exercise would only be approximately two weeks into 1987. In terms of the timeframes involved, these waivers to Part IV.F are not considered significant.

If you should have any questions after your review of this material, please contact me.

Sincerely yours,



F. A. Spangenberg
Manager - Licensing and Safety

TLR/ckc

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