

March 31, 2000

Mr. Michael T. Coyle
Site Vice President
Clinton Power Station
AmerGen Energy Company, LLC
Mail Code V-275
P. O. Box 678
Clinton, IL 61727

SUBJECT: PLANT PERFORMANCE REVIEW - CLINTON

Dear Mr. Coyle:

The purpose of this letter is to communicate our assessment of your staff's performance in operating the Clinton Power Station (CPS) and to inform you of our planned inspections at that facility. On March 7, 2000, we completed a Plant Performance Review (PPR) of CPS. We conduct these reviews to develop an integrated overview of the safety performance of each operating nuclear power plant. We use the results of the PPR in planning and allocating inspection resources and as inputs to our senior management meeting (SMM) process. This PPR evaluated inspection results and safety performance information for the period from February 1, 1999, through January 31, 2000, but emphasized the last 6 months to ensure that our assessment reflected your staff's current performance. Our most recent summary of CPS performance was provided to Mr. John P. McElwain in a letter dated March 26, 1999, and was discussed with him in a public meeting on April 16, 1999.

The NRC has been developing a revised reactor oversight process that will replace our existing inspection and assessment processes, including the PPR, the SMM, and the Systematic Assessment of Licensee Performance (SALP). We recently completed a pilot program for the revised reactor oversight process at nine participating sites and are making necessary adjustments based on feedback and lessons learned. We plan to begin initial implementation of the revised reactor oversight process industry-wide, including your facility, on April 2, 2000.

This PPR reflects continued process improvements as we make the transition into the revised reactor oversight process. You will notice that the following summary of plant performance is organized differently from our previous performance summaries. Instead of characterizing our assessment results by SALP functional area, we are organizing the results into the strategic performance areas embodied in the revised reactor oversight process. In addition, we have considered the historical performance indicator data that you submitted in January 2000 in conjunction with the inspection results in assessing CPS performance. The results of this PPR were used to establish the inspection plan in accordance with the new risk-informed inspection program (consisting of baseline and supplemental inspections). Although this letter incorporates some terms and concepts associated with the new oversight process, it does not reflect the much broader changes in inspection and assessment that will be evident after we have fully implemented our revised reactor oversight process.

At the beginning of the assessment period, CPS was shut down and in an extended outage which began in September 1996. Restart preparations were completed in early May 1999 and full power was reached on June 2. The plant was essentially operated at 100 percent power for the remainder of the assessment period with only a few exceptions. On June 5, power was reduced to 73 percent due to the inadvertent opening of a turbine bypass valve. On July 31, power was reduced to 50 percent until August 6 for condenser water box cleaning. On several other occasions, short duration, minor power reductions were made for control rod sequence exchanges and scram time testing.

Since restart from the extended outage, we have not identified any significant performance issues and note that CPS has operated in a safe manner. We also note that the transition of station ownership from Illinois Power Company to AmerGen in December 1999 proceeded smoothly. Long-term corrective actions to address identified performance deficiencies which were originally included in Illinois Power Company's Plan-for-Excellence have been subsumed by AmerGen's 5-year strategic plan. AmerGen has allocated resources to implement the strategic plan and the plan includes actions to address the weaknesses in station performance identified through NRC inspection activities.

In addition to the normal NRC inspection program since plant restart, regional initiative inspections were conducted to evaluate the effectiveness of your corrective action program, the conduct of plant operations, and the support provided by your engineering organization to plant operations. Performance concerns were identified in these three areas prior to plant restart. The regional initiative inspections consisted of an operational safety team inspection and a corrective action program inspection. Based on the results of these two inspections, as well as the results of the routine resident inspections that have been conducted during this assessment period, the NRC concluded that the corrective action program has been effective in ensuring that previously identified performance weaknesses did not develop into significant programmatic concerns. The NRC did however note that some process weaknesses continue to exist in operations.

In the reactor safety strategic area, the historical data submitted for the high pressure injection system performance indicator (PI) is in the white band. An inspection was conducted to review the circumstances associated with the high pressure core spray (HPCS) system unavailability which caused this particular PI to be white. The primary contributor to the PI value was the unexpected unavailability of the HPCS system during the fourth quarter of 1999 due to the time your staff needed to evaluate and replace an inadequately sized molded case circuit breaker (original design issue) for the minimum flow valve. Since an inspection has already been conducted to review the circumstances surrounding the white high pressure injection PI, we do not plan to conduct any further inspection of this issue. No other significant performance issues were identified in the reactor safety strategic area. Similarly, we did not identify any significant performance issues in the radiation safety or safeguards strategic performance areas. Based on our overall assessment of station performance, we plan to conduct only baseline inspections at your facility as noted in the enclosed inspection plan.

Enclosure 1 contains a historical listing of plant issues, referred to as the Plant Issues Matrix (PIM), that were used during this PPR process to arrive at our integrated view of performance trends at CPS. The PIM for this assessment is grouped by the prior SALP functional areas of operations, maintenance, engineering and plant support, although the future PIM will be organized along the cornerstones of safety as described in the revised reactor oversight process. The enclosed PIM includes items summarized from inspection reports or other docketed correspondence between the NRC and AmerGen regarding CPS. We did not document all aspects of your programs and performance that may be functioning appropriately. Rather, we only documented issues that we believe warrant management attention or represent noteworthy aspects of performance. In addition, the PPR may also have considered some predecisional and draft material that does not appear in the enclosed PIM, including observations from events and inspections that had occurred since our last inspection report was issued, but had not yet received full review and consideration. We will make this material publically available as part of the normal issuance of our inspection reports and other correspondence.

Enclosure 2 lists our planned inspections for the period April 2, 2000, through March 31, 2001, to allow you to resolve scheduling conflicts and personnel availability in advance of our inspector arrival on site. The inspection schedule for the latter half of the period is more tentative and may be adjusted in the future due to emerging performance issues at CPS or other Region III facilities. Routine resident inspections are not listed due to their ongoing and continuous nature.

We will inform you of any changes to the inspection plan. If you have any questions, please contact me at 630/829-9601.

Sincerely,

/RA/

Marc L. Dapas, Deputy Director
Division of Reactor Projects

Docket No. 50-461
License No. NPF-62

Enclosures: 1. Plant Issues Matrix
2. Inspection Plan

See Attached Distribution

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M. Aguilar, Assistant Attorney General
G. Stramback, Regulatory Licensing
Services Project Manager
General Electric Company
Chairman, DeWitt County Board
State Liaison Officer
Chairman, Illinois Commerce Commission
M. Reidy, Clinton Police Chief
The Honorable Tom Edmunds
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M. Strain, DeWitt County Emergency
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R. Scheffer, Piatt County Board Chairman
F. Sawlaw, Piatt County Sheriff
C. E. Morris, Emergency Services
Disaster Coordinator
R. Owen, Macon County Board Chairman
R. Walker, Macon County Sheriff
D. Sanner, Emergency Services Coordinator
INPO

cc w/encls: P. Hinnenkamp, Plant Manager
M. Reandeau, Director - Licensing
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Chairman, DeWitt County Board
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Preparedness Coordinator
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G. C. Riss, McLean County Board Chairman
S. Brienan, McLean County Sheriff
J. Wahls, Director, McLean County
Emergency Services and Disaster Agency
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Disaster Coordinator
R. Owen, Macon County Board Chairman
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D. Sanner, Emergency Services Coordinator
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