

AmerGen

An Exelon/British Energy Company

Clinton Power Station

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July 31, 2001

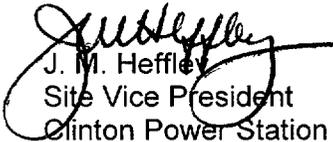
Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

Subject: Reply to a Notice of Violation

This letter provides the AmerGen Energy Company, LLC, (i.e., AmerGen) response to the Notice of Violation resulting from NRC Office of Investigations Report No. 3-2000-049, transmitted by letter dated July 2, 2001. The violation pertains to an allegation of deliberate falsification of post-modification test procedure records. AmerGen does not contest the violation. The response to the violation is due August 1, 2001, and is contained in the attachment to this letter. The attached response also provides the actions taken, and those actions to be taken, to communicate the seriousness of the violation to other employees to create a deterrent effect.

Respectfully,


J. M. Heffley
Site Vice President
Clinton Power Station

RSF/blf

Attachment

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Clinton Power Station

IE01

Attachment
Reply to a Notice of Violation
Clinton Power Station, Unit 1
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This letter provides the response of AmerGen Energy Company, LLC (i.e., AmerGen) to the Notice of Violation resulting from Clinton Power Station NRC Office of Investigations Report No. 3-2000-049 and transmitted by letter dated July 2, 2001. The violation involves an allegation of deliberate falsification of post-modification test procedure records.

The Notice of Violation states in part:

"information required by the Commission's regulations to be maintained by the licensee was not complete and accurate in all material respects. Specifically, on October 20, 2000, for activities affecting quality, specifically for the tests to verify that a modification installing a new and different water leg pump, No. 1E21C002, in the low pressure core spray and residual heat removal systems:

- (1) the signature in the "Performed by" signature block of procedure 1302.02F006 (Test No. RH-00-10-02), which performed the post-modification test to verify that the pump maintained sufficient pressure within the systems, was not made by the person whose name is indicated, and
- (2) the signature in the "Reviewed by" signature block of procedure 1302.02F006 (Test No. RH-00-10-01), which performed the post-modification test to measure the pump's minimum flow and to verify the pump's performance was consistent with its pump curve, was not made by the person whose name is included.

This information is material to the NRC, since it is used by the NRC to verify that the safety systems were correctly modified and to have confidence that the tests were adequately performed and documented in accordance with NRC requirements. This violation is classified as a Severity Level IV (Supplement 7)"

Reason for the Violation

The documentation associated with this falsification of records issue was for testing of a modification that installed a new design common water leg pump, equipment identification number 1E21C002, in the low pressure core spray (LPCS) and residual heat removal (RHR) train 'A' systems.

Two signatures on the post-modification test package cover sheets for the LPCS and RHR 'A' train water leg pump tests were not made by the person whose name is indicated on the document. Although the initials for steps within the test document CPS No. 1302.02F006, "Generic Test Form," for Test No. RH-00-10-02 are those of the person that performed the post modification induced leakage testing, the signature in the "Performed by" block on the test package cover sheet was not made by the individual who performed the test. The falsification of this cover sheet had no impact on the results of the test. In addition, the signature for the test results review on the test package cover sheet for the test document CPS No. 1302.02F006, Test No. RH-00-10-01, that reports the post-modification minimum flow test is not that of the person indicated on the cover sheet.

One individual was responsible for falsifying the signatures on the cover sheets of both test packages. The individual who falsified the signatures admitted doing so and resigned from AmerGen during the course of the investigation without providing a reason for the falsification. The investigation of this issue included interviews of other involved personnel and did not

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identify a reason for the falsification. The investigation concluded that the employee had not worked excessive hours, the employee whose signature was forged on the test record cover sheets could have been contacted, and supervision was not consulted on the appropriate actions to be taken to ensure proper completion of the test record cover sheets.

The falsification action was contrary to the policy presented to all employees at Clinton Power Station with protected area access during initial Plant Access Training (PAT) and during annual examination on PAT. This training specifically states that falsifying records will not be tolerated.

Corrective Steps that Have Been Taken and the Results Achieved

Prior to declaring the LPCS system and RHR train 'A' operable, the test results for the water leg pump installation were independently reviewed and found to be acceptable.

Disciplinary action was taken for the employee whose name was falsified, since that individual was aware of the falsification activity and failed to inform supervision.

A briefing was provided on October 21 and 22, 2000, to Engineering personnel emphasizing the policy discussed in the PAT regarding falsification of records. The briefing further explained the consequences associated with falsifying records including disciplinary action up to and including dismissal. The AmerGen policy and associated consequences for falsification of records were emphasized again to the Engineering staff in July 2001, to communicate the seriousness of this violation and create a deterrent effect.

Corrective Steps that Will Be Taken to Avoid Further Violations

A Supervisory Brief has been issued for supervisors to brief station personnel on the AmerGen policy forbidding falsification of records and the consequences associated with falsification of records. This brief communicates the seriousness of this violation to create a deterrent effect.

The Date When Full Compliance Will Be Achieved

AmerGen is presently in full compliance with the provisions of 10CFR50.9 and 10CFR50, Appendix B, Criterion XVII.