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ILLINOIS POWER COMPANY



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

JSP-0271-90
April 13, 1990

Docket No. 50-461

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

Subject: Clinton Power Station
Supplemental Information for Response to Generic
Letter 88-14, "Instrument Air Supply System
Problems Affecting Safety-Related Equipment"

Dear Sir:

The purpose of this letter is to provide an update to an April 6, 1989, letter (U-601384), which submitted the Illinois Power Company response to Generic Letter 88-14 regarding instrument air supply system problems. The Illinois Power Corrective Action Task force, which was established to verify root cause and corrective action adequacy of selected Clinton Power Station corrective action documents, identified that additional information should be provided on five commitments listed in the April 6, 1989 letter. These items and the additional information are listed in the attachment to this letter.

I hereby affirm that the information in this letter is correct to the best of my knowledge.

Sincerely yours,


J. S. Perry
Vice President

PGB/csm

Attachment

cc: NRC Region III, Regional Administrator
NRC Clinton Licensing Project Manager
NRC Resident Office
Illinois Department of Nuclear Safety

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Updated Generic Letter 88-14 Committed Actions

Committed Actions
in April 6, 1989 Letter

Reason for Update

1. ...Assigning instrument air dryer problems a higher priority (page 1 of 4, Item I Response, paragraph 2).

This statement was true at the time the April 6, 1989, letter was written. However, since that time, instrument air (IA) MWRs concerning IA quality had not routinely been worked with a high priority.

Actions Being Taken

During the week of March 5, 1990, the need to work instrument air MWRs concerning IA quality with a high priority was re-emphasized by station management to Operations and Maintenance personnel.

Reason for Update

2. ...adding procedure steps to certain preventive maintenance (PM) activities to specifically invoke the cleanliness control procedure... (page 1 of 4, Item I Response, paragraph 2).

The original review of the PM activities for all the instrument air supplied equipment did not identify all of the PM tasks needing cleanliness control procedure job steps.

Actions Being Taken

A condition report, which is the formal corrective action document for Clinton Power Station, was initiated to address the cleanliness control requirements for the PMs identified as needing such a requirement. The cleanliness control procedure jobsteps have been incorporated into the PMs that were identified as needing cleanliness control requirements.

Reason for Update

3. ...All three air dryers will be reworked shortly after the current refueling outage to improve their performance (page 1 of 4, Item I Response, paragraph 3)

A Maintenance Work Request (MWR) was prepared and worked on all three air dryers during the May-July 1989 period immediately following the refueling outage. The work was successful in improving the system dew point, however, further improvement in dew point is needed. It was also believed at that time that particulate sizes were not meeting specification based upon measurements at the discharge of the dryers.

Actions Being Taken

Several additional MWRs were written and are in the process of being worked to further improve the system dew point and address the problem of particulate size not meeting specification. This additional work includes sending some system piping off-site to be chemically cleaned and repassified. This work on the first air dryer is completed. The other two air dryers are expected to be similarly reworked by July 31, 1990, (depending on availability of parts). If the work on the air dryers does not result in the desired level of performance, an additional action plan will be developed to ensure that the instrument air system is brought into design specifications. During the process of investigating the problem with particulate sizes, it was determined that the filter used to collect the particulate test sample had loose particulate contamination (roughly 20-30 microns) before any instrument air was drawn through it. A new sampling technique was used on April 3, 1990, and showed the size of the instrument air particulate contamination was less than three microns. The initial results of this test shows that particulate contamination is not a problem as

was believed when the original response to Generic Letter 88-14 was issued. An evaluation of the testing technique is being performed.

Reason for Update

4. ...A PM task has been initiated, approved and scheduled for all equipment that required a PM task. (page 2 of 4, Item II Response, paragraph 1)

All equipment requiring a PM task was not identified to have an assigned PM task. For example, the requirement to drain instrument air filter regulators whenever the components they supply undergo maintenance was included in an administrative procedure but was not translated into a PM task.

Actions Being Taken

A condition report has been initiated to address the issue to drain the instrument air filter regulators. In addition, there are numerous vendor manual PMs that are suggested, as opposed to recommended, but have not been implemented at CPS. These PMs were reviewed as part of GL 88-14 and a decision was made to not implement them until additional operating and maintenance history was obtained. After the work identified in item three above is completed, these suggested PMs will be reviewed and implemented, if appropriate.

Reason for Update

5. N/A

Item III of the Generic Letter required "Verification that the design of the entire instrument air system including air or other pneumatic accumulators is in accordance with its intended function..." Instances have been discovered that indicate instrument air design problems may still exist. For example, Illinois Power recently identified that the problem reported in Information Notice 88-24 is applicable to CPS.

Action Being Taken

A Condition Report, 1-90-03-056, was generated. Investigation has indicated that some active safety-related valves are operated by solenoids which may not function as designed in the event that the instrument air line pressure regulator failed to reduce instrument air pressure. Corrective actions included replacing four such solenoids during PO-3 and the remaining solenoids after PO-3. LER 90-04-00 was issued on this topic.