



U-602131
L42-93(05-04)LP
4F.190
Illinois Power Company
Clinton Power Station
P.O. Box 678
Clinton, IL 61727
Tel 217 935-8881

May 4, 1993

Docket No. 50-461

Mr. A. B. Davis
Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Response to Request for Information About
the Plan to Upgrade Plant Labeling

Dear Mr. Davis:

This letter provides the Illinois Power (IP) response to Nuclear Regulatory Commission (NRC) Inspection Report No. 50-461/93005 (DRS). The inspection report requested a brief description of IP's plans for upgrading plant labeling, the schedule for upgrading Emergency Operating Procedure (EOP)-related equipment labeling, and a description of any priorities which have been established for upgrading plant labeling.

IP considers the plant labeling at Clinton Power Station (CPS) to be adequate and, as stated in the inspection report, the inspectors concluded that the plant labeling was adequate. Notwithstanding, IP had established a long-term program to upgrade CPS plant labeling. IP plans to implement the program as a "level of effort" activity over the life of the plant using existing resources. A specific schedule and priorities have not been established for implementing the program.

The plant labeling program is described in administrative procedure CPS No. 1033.00 "Plant Labeling Program." The procedure provides guidance for generation, placement and verification of labels for plant equipment. Guidelines for standardized labels (signs, tags, marking, legend plates) have been established and provided in Nuclear Station Engineering Department (NSED) Engineering Standard GS-2.00, "System and Component Labeling," which was developed in response to INPO Good Practice OP-208, "System and Component Labeling." The standard provides guidance on preparing labels that are acceptable

133

930602009B 930525
PDR ADDCK 05000461
G PDR

from the standpoint of material, installation and human factors. Using this guidance will provide consistent, readable and permanent identification of rooms and plant components such as valves, instruments, pipes, breakers, switches, electrical and control panels, and electrical components inside panels.

The Operations Support Group will be responsible for reviewing label requests and initiating label manufacture. Labels that cannot be produced at CPS will be supplied by vendors.

Label installation will normally be accomplished by plant area and system. The conversion from the current metal identification tags to upgraded labeling will be an extended process. Therefore, the plant systems and areas will at times have both metal tags and upgraded labeling installed.

The plant labeling program has provisions for maintaining labeling. All plant personnel are expected to report any identified labeling deficiencies to the Operations Support Group by submitting a Label Request Form (CPS No. 1033.00F001).

The currently installed labeling is adequate. However, IP has established a long-term program to upgrade the plant labeling. This program will enhance the readability and consistency of labeling at CPS.

Sincerely yours,



F. A. Spangenberg, III
Manager, Licensing and Safety

RSF/nls

cc: NRC Clinton Licensing Project Manager
NRC Document Control Desk
NRC Resident Office, V-690
Illinois Department of Nuclear Safety