



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 13, 1994

Docket No. 50-461

Clinton Power Station
ATTN: Mr. Richard F. Phares
Director - Licensing
Post Office Box 678
Mail Code V920
Clinton, Illinois 61727

Dear Mr. Phares:

SUBJECT: IMPLEMENTATION OF GENERIC LETTER 83-28, "REQUIRED ACTIONS BASED ON
GENERIC IMPLICATIONS OF SALEM ATWS EVENT," SECTIONS 2.2.1.1
THROUGH 2.2.1.4 - CLINTON POWER STATION (TAC NO. M88607)

Your letter of September 22, 1993 (U-602168), described findings of a recently completed review of the Clinton Power Station Master Equipment List (MEL). The review determined that Illinois Power has implemented the requirements of Sections 2.2.1.1 through 2.2.1.4 of Generic Letter 83-28 differently than discussed in previous correspondence. While differences existed in the actual implementation, you concluded that Illinois Power has always remained in compliance with the requirements of the Generic Letter.

We have reviewed your correspondence and discussed the issues with your staff. The following describes our understanding of the differences that existed between the original correspondence and the actual implementation.

Audits of the MEL

Your letter of May 27, 1988 (U-601200), stated that "evaluations and audits are periodically performed by internal/external organizations to evaluate the program(s) that determines and/or identifies classification of components." It was later determined by your staff that the above statement could be interpreted to imply that audits are performed on the MEL. Your most recent letter states that audits are performed on those activities which identify the classification of components. The staff understands that the MEL itself is not audited but its use is evaluated as part of these audits.

Relationship Between the MEL and the Design Status System

The classification of components is maintained through established interfaces between the Nuclear Station Engineering Department and the MEL group. When changes are made to design and reference documents, the Design Status System (DSS), the computerized database which contains information on design documents' status, is updated to post the document change to the affected documents. Your letter of September 22, 1993, states that when the design change is ready to be incorporated into the affected documents, the DSS is

130000
9404210304 940413
PDR ADOCK 05000461
P PDR

NRC FILE CENTER COPY

DF01/10

Mr. Richard F. Phares

-2-

April 13, 1994

updated a second time. Following this second update of the DSS, the MEL group reviews the revised documents and makes any necessary changes to the MEL.

Statements included in the May 27, 1988, letter could be interpreted to imply that the MEL is updated each time that the DSS is updated. However, the staff understands that the MEL is only updated once, when the design is incorporated into the affected documents.

Electronic Transfer of Data to the MEL

The May 27, 1988 letter, stated that safety-related components were identified in the GE Master Parts List, controlled Sargent & Lundy component listings, design documents (drawings, specifications, etc,) and the Final Safety Analysis Report. The letter further stated that the MEL was developed to consolidate classification information based on these documents. However, these statements imply that the sources used to determine safety classifications were restricted to these specific documents. As clarified in your letter of September 22, 1993, additional sources were used in determining safety classifications. The staff understands that additional sources included the Nuclear Station Engineering Department safety and class code consolidation/simplification cross-reference table, applicable industry codes, and the Standardized Nuclear Applications Program data.

Use of MEL as a Source of Information for Components

The May 27, 1988 letter, states that the MEL "is available to users as a single, consistent and unambiguous source of information for components installed in the plant." The staff understands that while the MEL is the primary source of information for safety classifications, other plant documents are also available for such purposes.

The staff has reviewed your correspondence and has a better understanding of the implementation of Sections 2.2.1.1 through 2.2.1.4. Based on our review, we concur that you have maintained compliance with the requirements of the Generic Letter.

Sincerely,

ORIGINAL SIGNED BY:

Douglas V. Pickett, Senior Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

cc: See next page

DISTRIBUTION
SEE ATTACHED PAGE

PDIIV-3:LA
MRusbrook
4/12/94

^{DVP}
PDIII-3:PM
DPickett/dvp/bj
4/12/94

^{JW}
HICB
JWermiel
4/13/94

^H
PDVII-3:PD
JHannon
4/13/94

OFFICIAL RECORD

DOCUMENT NAME: G:\CLINTON\CLM88607.LTR

April 13, 1994

DISTRIBUTION

~~Docket File~~
NRC & Local PDRs
PDIII-3 Reading
JRoe
JZwolinski
JHannon
MRushbrook
DPickett
JWermiel
BClayton, RIII
EGreenman, RIII
Lead PM, RIII