



U-602378
L42-95(01 - 06)LP
1A.120

January 6, 1995

Docket No. 50-461

10CFR2.201

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

Subject: Illinois Power Revised Response to
Notice of Violation 50-461/91023-04(DRP)

Dear Sir or Madam:

This letter provides a revised Illinois Power Company (IP) response to Notice of Violation (NOV) 50-461/91023-04(DRP). The NOV discussed the multiple occurrences of the drywell atmosphere particulate radioactivity monitoring system being inoperable without complying with the applicable Technical Specification action statement. IP letter U-601935 dated March 2, 1992, provided the IP response to the subject NOV with IP letter U-601984 dated May 28, 1992, providing a supplemental response.

The IP response to the subject NOV attributed the cause of the violation to several factors. These factors included poor design of the fission product monitor in that the monitor did not provide external indication of filter paper movement, a preventive maintenance program that had not scheduled replacement of the fission product monitor filter paper at an appropriate interval, a preventive maintenance task instruction that did not provide guidance on operability of the fission product monitor, and maintenance and operations personnel who did not have a clear understanding of the impact of non-moving filter paper on the operability of the fission product monitor.

As corrective action for the subject NOV, a modification was installed on the fission product monitor which allows operations personnel to visually verify filter paper movement on a shiftly basis. In addition, to ensure timely replacement of filter paper, instructions to perform filter paper replacement were incorporated into a Clinton Power Station (CPS) procedure with completion of this procedure tracked by the CPS Surveillance Tracking program. Finally, CPS engineering personnel evaluated performance of the fission product particulate sample panel and determined that to improve reliability of the monitor, the monitor would be replaced with a fixed filter fission product monitor. This replacement was to occur during the CPS fifth refueling outage (RF-5) and was to be implemented by modification LD-026.

Since the May, 1992, decision was made to replace the existing fission product monitor, no additional events have occurred involving the moving filter paper which placed CPS in a condition prohibited by CPS Technical Specifications. This performance can be directly attributed to corrective actions taken as a result of the subject NOV as discussed above.

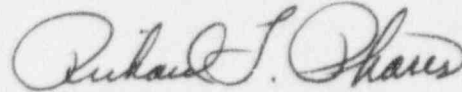
Identification of a recent fission product monitor inoperability can be attributed to corrective actions as discussed above. Specifically, on October 11, 1994, at approximately 2228 hours, during performance of CPS surveillance procedure 90C2.02, "Unit Attendant Surveillance Log, " Operations personnel determined that the fission product monitor filter paper was not advancing. Following this determination, the fission product monitor was immediately declared inoperable and the action as required by CPS Technical Specifications for an inoperable drywell atmosphere particulate radioactivity monitoring system was initiated. It was subsequently determined that the fission product monitor moving filter paper spool had been installed such that the media collection side of the paper was not facing the monitor detector. This caused the filter paper to tear resulting in filter paper movement being stopped. By October 12, 1994, at 0025 hours, the orientation of the filter paper had been corrected and the fission product monitor was returned to operability.

To address a previous concern regarding the orientation of the filter paper, CPS procedure 8643.03, "Air Particulate Monitor E31-P002 Filter Paper Replacement," was revised to provide instructions to ensure that the moving filter paper is installed such that the media collection side of the moving filter paper is facing the fission product monitor detector. Instructions were also provided such that the media collection side of the moving filter paper can be identified prior to installation in order to facilitate correct orientation of the filter paper in the fission product monitor. These actions enhance corrective actions taken for the subject notice of violation and will preclude recurrence of the moving filter paper being installed in a manner which will affect operability of the fission product monitor such as occurred on October 11, 1994, as described above.

As stressed above, since the corrective actions in response to the subject notice of violation were implemented, the fission product monitor has reliably performed its intended function. Recent problems with filter paper orientation have been resolved and adequate corrective actions have been taken. Because of the demonstrated fission product monitor reliability, IP has made the decision to not replace the existing fission product monitor with a fixed filter monitor. IP has discussed this decision with CPS Senior Resident Inspector, Mr. M. J. Miller.

IP believes that actions taken have resolved the concerns associated with the fission product monitor reliability.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Richard F. Phares".

Richard F. Phares
Director, Licensing

MAR/csm

cc: NRC Regional Administrator, Region III
NRC Clinton Licensing Project Manager
NRC Resident Office, V-690
Illinois Department of Nuclear Safety