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Docket No. 50-461

10CFR50.54(a)(3)

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

Subject: Quality Assurance Program Revision  
Clinton Power Station

Dear Sir:

Attached for your review and approval are two changes to the Clinton Power Station (CPS) quality assurance (QA) program consisting of the following:

- Revise CPS commitment to Regulatory Guide 1.33, Revision 2 (February 1978), "Quality Assurance Program Requirements (Operations)," to perform audits in selected areas on the same frequency as stated in American National Standards Institute (ANSI) Standard N18.7-1976.
- Revise CPS commitment to Regulatory Guide 1.144, Revision 1 (September 1980), "Auditing of Quality Assurance Programs for Nuclear Power Plants," to allow the auditing organization to determine which program deficiencies or nonconformances require root cause evaluation and follow-up by the auditing organization.

The purpose of these changes is to utilize audit resources in the most effective manner.

Both changes have been determined to be reductions in quality assurance program commitments, therefore, require NRC review and approval prior to implementation. Illinois Power (IP) intends to implement these changes within 60 days in accordance with

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10CFR50.54(a)(3)(iv). IP has evaluated the changes to the CPS QA program and has concluded that the revisions to the CPS QA program continue to satisfy the requirements of 10CFR50, Appendix B.

Sincerely yours,

*W.S. Clark for*  
Richard F. Phares  
Director, Licensing

JLP/csm

Attachment: Summary of Changes and Justification

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

## Changes to the Clinton Power Station Quality Assurance Program

### Summary of Changes and Justification

1. Revise CPS commitment to Regulatory Guide 1.33, Revision 2 (February 1978), "Quality Assurance Program Requirements (Operations)," to perform audits on the same frequency as stated in American National Standards Institute (ANSI) Standard N18.7-1976.

### Background:

In accordance with the CPS Updated Safety Analysis Report (USAR), CPS currently complies with Regulatory Guide 1.33, Position C.4, which endorses ANSI Standard N18.7-1976, Section 4.5, "Audit Program," by stating that "audits of selected aspects of operational phase activities shall be performed with a frequency commensurate with their safety significance and in such a manner as to ensure that audits of all safety-related functions are completed within a period of 2 years." Regulatory Positions C.4.a, C.4.b, C.4.c specify more frequent audits for selected program elements. The CPS Technical Specifications previously contained audit requirements and frequencies; however, with the implementation of the Improved Technical Specifications, the audit requirements and frequencies were relocated to the Operational Requirements Manual (ORM) Section 6.5.2.8. The proposed changes to the ORM consist of the following:

- a. Revise the frequency from 6 months to 12 months for audits encompassing the results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety.
- b. Revise the frequency from 12 months to 24 months for audits encompassing the conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions.
- c. Revise the frequency from 12 months to 24 months for audits encompassing the performance, training and qualifications of the entire unit staff.

The above changes will allow CPS to schedule audits based upon the current 18-month fuel cycle rather than on the annual or semi-annual basis as performed currently. The CPS USAR and the ORM will be revised to reflect CPS revised commitment to Regulatory Guide 1.33.

Justification:

The current audit program requirements consume resources for auditing areas having fewer problems that would be better spent in monitoring and assessing weak areas or areas of declining performance. The proposed changes would allow CPS to schedule audits to better match plant activities. This would result in more meaningful results and would allow more flexibility in scheduling audits. The audits required by ANSI N18.7-1976 would generally be scheduled on a two-year basis, but the intent is to schedule the audits to follow the 18-month fuel cycle. Audit attention may be increased if the organization or program shows a declining level of performance as indicated by trend reports or as directed by management. This change will not result in a reduction of the overall effectiveness of the quality assurance program at CPS and will continue to meet 10CFR50, Appendix B.

2. Revise CPS commitment to Regulatory Guide 1.144, Revision 1 (September 1980), "Auditing of Quality Assurance Program for Nuclear Power Plants," to allow the auditing organization to determine which program deficiencies or nonconformances require root cause evaluation and follow-up by the auditing organization.

Background:

In accordance with the CPS USAR, CPS currently complies with Regulatory Guide 1.144, which endorses ANSI Standard N45.2.12-1977, "Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants." The current practice for processing audit findings identified by the auditing organization requires the management of the audited organization to perform root cause analysis, to take corrective action and actions to prevent recurrence prior to submitting the audit finding for closure. The CPS Nuclear Assessment (NA) department performs a verification of implementation of remedial actions and actions to prevent recurrence prior to closure. NA also approves corrective actions to remedy the deficiency. The proposed change will enable the auditing organization to determine which program deficiencies or nonconformances (based upon significance) require root cause evaluation and/or follow-up by the auditing organization. Corrective action implementation for deficiencies or nonconformances of lower significance is verified through the site corrective action program and the normal audit and surveillance process. (Reference ANSI N45.2.12 Sections 4.3.2, Audit Process, and 4.5, Follow-up).

The CPS USAR will be revised to reflect the above change.

Justification:

Conditions adverse to quality are currently reported and processed in accordance with a common corrective action system used by all departments at CPS. Processing of conditions adverse to quality (findings) identified during the audit process, that are determined to be significant, will not be changed. However, findings of low significance (based on nuclear safety, radiological safety, regulatory considerations or other factors as deemed by the auditing organization) may require remedial corrective actions only (i.e., no root cause or action to prevent recurrence). For these findings, the plant trending program and periodic re-audits will identify declining trends and the need for additional actions. The current program expends resources on verification activities in areas of low significance. The proposed change will allow resources to be used on other assessment activities in areas having more significance and maximize the effectiveness of the audit program. The proposed change will not result in a reduction of the overall effectiveness of the quality assurance program at CPS and will continue to meet 10CFR50, Appendix B.