



Illinois Power Company
Clinton Power Station
P.O. Box 678
Clinton, IL 61727
Tel 217 935-8881

U-602496
L30-95(09 - 26)LP
1A.120

September 26, 1995

Docket No. 50-461

10CFR50.54(a)

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

Subject: Quality Assurance Program Description Change

Dear Sir:

Attached for your review and approval is a proposed change to the Clinton Power Station (CPS) quality assurance program description (QAPD) regarding the method that Illinois Power (IP) proposes to use to meet the procedure adherence guidelines contained in ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants." The attached page change will be incorporated into the CPS Updated Safety Analysis Report (USAR) Section 1.8, Regulatory Guide 1.33, Revision 2 (February 1978), "Quality Assurance Program Requirements (Operation)." The proposed change is designated by a vertical line in the right hand margin.

One of the areas IP has identified for improvement at CPS is reduction of personnel errors, specifically, adherence to procedures. To achieve the improvement, IP established a team to review the use of procedures at CPS and develop a station procedure describing management expectations regarding use and adherence to procedures. The team developed a program that incorporates a graded approach to procedure use based on the significance of the activity being performed, as recommended by INPO Significant Operating Experience Report (SOER) 92-01, "Reducing the Occurrence of Plant Events Through Improved Human Performance." IP is developing administrative procedure CPS 1005.15, "Procedure Use and Adherence," to incorporate the graded approach for use of and adherence to station procedures at CPS.

The graded approach is a change to the existing philosophy on procedure use and adherence. In some cases, the controls will be more restrictive than the current practice but for the most part the change will give the procedure user some flexibility for using procedures that may be overly restrictive. In some cases, the proposed change will result in more supervisory involvement during the performance of activities.

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The proposed change provides two levels of procedure use, "continuous use" and "flexible use." The designated level of procedure use identifies the minimum required reference personnel must make to the procedure during performance of an activity. The minimum level of use designated depends on the complexity of the activity, the frequency of performance of the activity, the qualifications and skills of the intended procedure user, the availability of equipment to perform re-tests (e.g., a re-test that can only be performed during an outage), the extent of supervisory involvement, and the potential consequences of improper performance. Supervision will be responsible for classifying applicable procedures as "continuous use" or "flexible use," and the classification will be identified on the procedure title page.

"Continuous use" means the procedure is present at the work location and is followed step-by-step during performance of the task. The types of procedures that are classified as "continuous use" are those that are developed for extensive or complex jobs where reliance on memory of procedure steps cannot be trusted for proper performance and where improper performance of the activity is likely to result in an adverse effect on nuclear safety, personnel safety or plant reliability.

Types of activities that may require "continuous use" procedures include:

- Infrequently performed tasks
- Complex tasks for which evolutions are normally performed in a specific sequence
- A complex Technical Specification surveillance test that requires lifting leads and taking data and is performed at a frequency of 18 months or greater, such as channel calibration and logic system functional tests
- A complex activity which, if performed incorrectly, the error would not be immediately detected, such as replacement of seals for a large pump when the pump cannot be tested until the plant is on line, and a plant shutdown is required to correct problems

"Flexible use" means the procedure should be at the work location and the user refers to the procedure as often as necessary to perform the task. However, the procedure may not be required to be at the work location for routine procedural actions that are frequently repeated and personnel have committed to memory. "Flexible use" procedures are written to delineate a recommended method of accomplishing a task correctly and safely. Supervision may require the procedure user to perform a "flexible use" procedure as if it was a "continuous use" procedure.

Types of activities that may be included in "flexible use" procedures include:

- Daily Technical Specification channel check surveillance tests
- Daily source checks
- Routine operator rounds
- Weekly surveillance performed by personnel very familiar with the task, no lifting or landing of leads is required and incorrect performance can be detected prior to the end of the activity, such as a channel functional test
- Administrative directions for generating documents or reports where reference to the procedure is on an as-needed basis, such as the condition report procedure
- Complex and seldom performed activity when the equipment is out of service and errors in procedure performance would be detected prior to completion of the activity, such as a relay test procedure

Additionally, the proposed change allows the use of "alternate methods" for performing activities governed by "flexible use" procedures. An "alternate method" is an acceptable way of accomplishing a task that satisfies the intent of a particular step or section of a procedure. An "alternate method" is not a temporary change (as discussed in ANSI N18.7-1976 section 5.2.2) provided the procedure can be performed as written. "Alternate methods" may be used as long as regulatory commitments are satisfied, "shall" statements are satisfied, hold/witness inspection points are satisfied, plant and personnel safety is not compromised, and supervision concurs with the use. If an "alternate method" is used to perform a task, the method used will be documented in the work document or procedure.

Types of activities where use of an "alternate method" would be acceptable include:

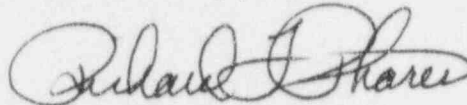
- The step in a procedure requires removal of a bearing cap using an eye-bolt and lifting the cap with an overhead crane. Mechanics can remove the bearing cap using rigging suspended from a fork lift truck. The supervisor concurs with the "alternate method," the "alternate method" is performed and documented.
- A Chemistry procedure requires putting a drop of oil on a recorder gear using a toothpick. A toothpick is not available. The technician can use a paper clip to apply the oil. The supervisor concurs with this "alternate method"; the "alternate method" is performed and documented.

IP is developing specific training for CPS staff to ensure that personnel understand management expectations on procedure adherence, the concept and proper implementation of the different levels of procedure usage, and when procedure changes are necessary.

IP has reviewed the proposed change for impact on the QAPD and has concluded that the "alternate method" concept does not reduce any commitment in the currently accepted QAPD. Using an "alternate method" will not affect satisfactory accomplishment of activities or the ability to meet the procedure acceptance criteria. The controls for implementing the "alternate method" concept ensure that the Clinton Power Station (CPS) quality assurance program continues to satisfy the requirements of 10CFR50, Appendix B.

To meet a planned implementation schedule of November 30, 1995, IP would appreciate NRC consideration of this issue for an expedited review. IP needs NRC approval of the proposed change by October 31, 1995, to meet the scheduled implementation date. The "alternate method" concept has been discussed with Mr. M. Miller, NRC senior resident inspector at CPS, and Mr. F. Maura, NRC Region III.

Sincerely yours,



Richard F. Phares
Director, Licensing

RSF/csm

Attachment

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

CPS-USAR

Revision 7

Regulatory Guide 1.33, Rev. 2 (February 1978) (cont'd)

- 9) Reference: Section 5.2.2 of ANSI N18.7-1976, Procedure Adherence. Clinton Power Station complies with Section 5.2.2 in the following manner:

Clinton Power Station has categorized station procedures into two types, "continuous use" and "flexible use," based on the significance of the activity.

An exception is taken to the required approval of temporary changes which do not change the intent of the procedure. For "flexible use" procedures, an "alternate method" may be used to perform the activity, provided the procedure can be performed as written and the "alternate method" used is documented in the work document or procedure. An "alternate method" may be used as long as regulatory commitments are satisfied, "shall" statements are satisfied, hold/witness inspection points are satisfied, personnel and nuclear safety is not compromised, and supervision concurs with the use.