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April 28, 1992

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: Results of Review of Clinton Power
Station Corrective Action Program

Dear Mr. Davis:

In response to U.S. NRC Notices of Violation 50-461/91020-01 and 50-461/91023-04, Illinois Power (IP) committed to performing a review of the Clinton Power Station (CPS) Corrective Action Program. The purpose of this review was to determine if any enhancements to the program should be made. Additionally, IP committed to performing a causal factor analysis of the two Notices of Violation to determine if a generic weakness was present and to implement any corrective actions needed.

The causal factor analysis and the review of the Corrective Action Program have been completed. The results of these reviews are included below.

Causal Factor Analysis

IP Quality Assurance (QA) personnel performed detailed causal factor analysis of the conditions surrounding NRC Notices of Violation 50-461/91020-01 and 50-461/91023-04. This analysis identified one generic program weakness and one common contributing factor to the violations. The weakness involved the CPS Preventive Maintenance (PM) program. Specifically, when the PM program was used to perform corrective maintenance, often the corrective maintenance information (including the frequency of performance) was not trended or reviewed for trending. To correct this weakness, CPS Maintenance has developed a computer program which compares the periodicity of the PM task to the frequency at which the PM task is performed. Those PM tasks that are performed at a frequency higher than scheduled will be reviewed for trending and will be forwarded to the Nuclear Station Engineering Department's (NSED) Reliability Engineering group to be included in the hardware trending program.

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The common contributing factor identified during the analysis was the lack of significance placed on the fire pump and the fission product monitor due to their classification. In response to these violations and because of the long-standing material problems associated with the fire pump and the fission product monitor, IP management has established a list of items identifying the top ten long-standing material problems at CPS. This list will serve as a management tool to monitor and assure that actions are being taken in a disciplined approach to resolve these material problems in a more timely manner. The list raises the level of management attention to problems regardless of their classification and does not distinguish between safety and non-safety systems.

Corrective Action Program Review

A multi-departmental corrective action improvement team was formed to conduct a review of the Corrective Action Program for enhancements. The purpose of this review was to evaluate performance, identify enhancements, establish actions and assign responsibilities and scheduled completion dates for the identified actions. This review concentrated on the timeliness of corrective actions and the trending of recurring problems.

To assess the timeliness of corrective actions, the team reviewed 320 open corrective action documents. The review included sixty-eight mandatory modifications, 248 Maintenance Work Requests (MWRs) and four Condition Reports (CRs) for which the root cause had not yet been identified. The scheduled completion dates were reviewed for timeliness. Those completion dates that were determined to be untimely were appropriately rescheduled.

In addition, the team tasked QA with performing a surveillance on CRs open greater than one year and identifying those CRs which contained corrective actions that QA determined to be untimely. Forty-eight Condition Reports were reviewed. Of those, eleven CRs were considered untimely because of unsatisfactory progress in the implementation of the corrective action. Each of these eleven CRs has been reviewed by the responsible department management. Where appropriate, the corrective action schedules have been adjusted to improve the timeliness of the corrective actions.

After reviewing the evaluation of existing corrective action documents and the specific problems with the fire pump and fission product monitor, the team focused on enhancements which would prevent untimely corrective action. Standard guidelines for the documentation of CR extension requests were issued to all CR coordinators and directors. The standardized form requires identification of specific information about the impacts of extending corrective actions prior to the director approving the extension. The extension request is reviewed by CPS Programs and Support personnel for the appropriateness of the extension. The Corrective Action Review Board monitors the number of extensions and justifications. These guidelines ensure that adequate information is being provided prior to the approval of the extension. This action is complete and has been in effect since January 23, 1992. The action has proven effective in increasing management attention to corrective action timeliness.

With respect to the trending of problems identified on CRs and MWRs, the following actions are being taken. To improve trending of hardware issues documented on CRs, a software change to the computerized Corrective Action Tracking System has been submitted to Information Systems. This change will allow entry of Equipment Identification Numbers (EIN) into the database. When the software changes have been completed, CPS Programs and Support will backfit the data for all open CRs and those CRs closed within the last year to ensure the database is effective upon implementation. The EIN information will also be used to identify recurring hardware issues to the Corrective Action Review Board for use in determining when a root cause analysis is required. The EIN information will allow the CR owner to have a tool to identify previous corrective actions which may have been ineffective. This action will be complete by October 1, 1992.

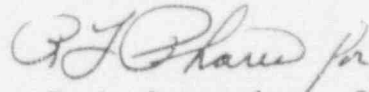
Additionally, NSED's Reliability Engineering group reviewed the trending of PM tasks and MWRs to determine if improvements could be made. This review identified areas for improvement. After completion of the current refueling outage (RF-3), NSEL Reliability Engineering will be coordinating the implementation of these improvements with Plant Maintenance. This activity is scheduled to be complete by August 1, 1992.

In an effort to improve the CR owners' awareness of the available sources for trending information, CPS 1016.01, "CPS Condition Reports", will be revised to add Reliability Engineering as the source for Nuclear Plant Reliability Data System (NPRDS) information and identify Licensing and Safety as the source for Industry Information. CPS 1016.01 currently identifies Quality Assurance as a source for trending information and Reliability Engineering as a source for hardware trending information. This action will be complete by May 15, 1992.

An additional area identified as needing improvement was interdepartmental communication between those departments owning CRs and those departments owning corrective actions for those CRs. These actions were previously tracked by the Centralized Commitment Tracking (CCT) System. To improve communication and eliminate duplicate tracking, the computerized Corrective Action Tracking System has been expanded to allow tracking of up to ten corrective actions associated with any individual CR. The reports from the Corrective Action Tracking System allow the CR owner to readily see the corrective actions for which the CR owner is responsible, as well as those corrective actions owned by other departments. Procedures CPS 1016.01, "CPS Condition Reports," Nuclear Planning & Support 1.06, "Centralized Commitment Tracking (CCT) System", and CPS 1022.01, "Centralized Commitment Tracking Requirements for Plant Staff", will be revised to delete the requirements for using CCTs to track open action items identified on CRs. This action will be complete by May 15, 1992.

IP is confident the enhancements discussed in this letter will strengthen the CPS Corrective Action Program and resolve recent concerns in this area.

Sincerely yours,



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

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cc: NRC Clinton Project Manager
NRC Resident Office
NRC Document Control Desk
Illinois Department of Nuclear Safety