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ILLINOIS POWER COMPANY

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U-10195

CLINTON POWER STATION, P.O. BOX 678, CLINTON, ILLINOIS 61727

August 17, 1984

Docket No. 50-461

Mr. James G. Keppler
Regional Administrator
Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Potential 10CFR50.55(e) Deficiency 55-84-07
Use of GE Non-Site Specific Design
Specifications for CPS Application

Dear Mr. Keppler:

On March 28, 1984, Illinois Power notified Mr. F. Jablonski, US NRC, Region III (Ref: IP memorandum Y-20510, dated March 28, 1984) of a potentially reportable deficiency under the provisions of 10CFR50.55(e) pertaining to the possible use of General Electric generic versus plant specific design specifications in developing preoperational test procedures in use at Clinton Power Station (CPS). This initial notification was followed by one (1) interim report (Ref: IP Letter U-10149, D. P. Hall to J. G. Keppler, dated April 27, 1984).

Our investigation of this issue is progressing, and this letter is submitted as an interim report in accordance with the requirements of 10CFR50.55(e).

Statement of Potentially Reportable Deficiency

Illinois Power Plant Operations identified a problem in determining specific General Electric design specifications applicable to CPS. Illinois Power Startup staff use GE design specifications as a basis in writing CPS preoperational test procedures. Use of GE documents not directly approved for CPS may have resulted in incomplete preoperational test procedures. We are reviewing this concern for possible adverse impact on the safety of operation of CPS.

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Background

Illinois Power Plant Operations issued a Condition Report (I-83-03-067) on March 23, 1984, indicating that a problem may exist with the use of GE generic document 22A3899, "Control Rod Drive System Fast Scram," as a basis for writing a preoperational test procedure (PTP-RD-07), whereas document 22A5395, specific to CPS, should have been used. A GE reference listing of documents (CDCS) was used to determine applicable design specifications as a basis for the test procedures.

Investigation Results

Illinois Power has prepared and implemented an investigation plan to determine the extent of this problem at CPS. The investigation plan included:

1. A report was prepared by General Electric outlining the specific listing and means to determine the correct documents and instruction manuals applicable to CPS.

2. Procedures used by CPS staff to identify the correct controlled GE documents and instruction manuals, applicable to CPS, were reviewed to uncover any ambiguities in the selection of controlled documents for use in writing testing and other procedures.

3. Documentation control used for other than GE equipment was reviewed for similar problems in selecting controlled information.

Our investigation to date has determined that the primary root cause of the problem stems from some CPS personnel not being fully cognizant of the correct methods for determining GE documents that are specific to CPS. The GE Manual - Engineering Documentation Systems, provides direction on how to use the GE documentation system. The manual states that following issuance, the Master Parts List (MPL) becomes the principal working document for the CPS project, with respect to hardware and software to be provided by GE. The MPL is the top tier controlled document that references lower tier documents. The MPL must be used to determine which documents are applicable to CPS.

The CDCS, by contrast, is a listing of the latest revision of each document transmitted to CPS from GE, regardless of the specific applicability to CPS. The CDCS functions to provide an ongoing transmittal log of GE transmitted documents. The GE Engineering Information System (EIS) lists the latest revision of all documents directly applicable to CPS and those identified as references on these documents.

In summary, the MPL is used to determine which GE documents are applicable to CPS. The EIS is used to determine the latest document revision.

Corrective Action (Interim)

To date, the following corrective action is being taken:

1. Training is being conducted on the proper use of GE documentation. Emphasis will be placed on assuring that CPS personnel are aware that the MPL is the parent document to be used in determining applicable GE documents.

2. Appropriate CPS procedures are being revised to specifically state that the MPL should be used to determine appropriate GE documents.

3. IP Test Procedure PTP-RD-07 is being revised to reference and agree with the correct design specification.

4. A review of all issued test procedures is being performed to assure that the correct references were used. The test procedures will be revised where appropriate to correct identified discrepancies.

5. An EIS terminal is being provided for use by the Startup and Plant Operations Groups. The EIS terminal will provide on-line computer capability for determining the latest revision to GE documents.

6. The Startup Library is being provided with a controlled copy of the MPL for use in determining applicable GE documents.

Safety Implications/Significance

Illinois Power's investigation of this potentially reportable deficiency is continuing. The safety implication and significance will be assessed after further background information is evaluated. Approximately sixty (60) days will be required to complete the investigation, determine reportability, and file a final report on this potentially reportable deficiency.

We trust that this interim report provides sufficient information to perform a general assessment of this potential deficiency and adequately describes our overall approach to resolve this problem.

Sincerely yours,

D. P. Hall
Vice President

RLC/cah

cc: NRC Resident Office
Director, Office of I&E, US NRC, Washington, DC 20555
Illinois Department of Nuclear Safety
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