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U-602547
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1A.120

February 13, 1996

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:

On September 26, 1995, Illinois Power (IP) submitted (via IP letter U-602496) a proposed change to the Clinton Power Station (CPS) quality assurance program description (QAPD) regarding the method CPS was planning to use for meeting the procedure adherence guidelines contained in ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants." The submittal proposed a graded approach to procedure use at CPS 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."

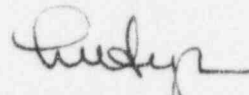
The proposed change included the use of "alternate methods" to perform activities governed by some procedures. The "alternate method" concept was presented as an acceptable way of performing a task that satisfied the intent of a particular step or section of a procedure. The "alternate method" was not considered to be a "temporary change" as discussed in ANSI N18.7-1976, section 5.2.2, since the procedure had to be performable as written. In addition, regulatory commitments, "shall" statements, and hold/witness inspection points in the procedure had to be satisfied, personnel safety could not be compromised, supervision had to concur with the "alternate method" use, and the method used had to be documented in the work document or procedure. Although IP determined that using the "alternate method" would not have reduced any commitment in the approved QAPD, IP was seeking NRC approval of the change based on a recommendation by NRC staff.

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After submittal of the proposed change, IP staff discussed the proposed change with NRC Region III and Headquarters staff who indicated that they reviewed the "alternate method" concept as a temporary change to the procedure which would require the approvals described in the "temporary change" program. On the basis of this discussion and further consideration, IP has decided to withdraw the submittal and request for NRC approval. IP intends to implement a graded approach to procedure use by incorporating the desired flexibility into the procedure text. IP plans to review the applicable procedures and remove specificity and eliminate unnecessary restrictions where appropriate. Any changes to the procedures identified during this evolution will be processed through the existing procedure review and approval process.

Sincerely yours,



Michael W. Lyon
Director-Licensing

RSF/csm

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