

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-461/84-21(DRS)

Docket No. 50-461

License No. CPPR-137

Licensee: Illinois Power Company
500 South 27th Street
Decatur, Illinois 62525

Facility Name: Clinton Nuclear Power Station, Unit 1

Inspection At: Clinton Site, Clinton, Illinois

Inspection Conducted: July 17-20 and 24-27, 1984

Inspectors: *T. Vandell*
T. Vandell

8/22/84
Date

J. A. Malloy
J. Malloy

8-22-84
Date

Approved By: *F. Hawkins*
F. Hawkins, Chief
Quality Assurance Programs Section

8/22/84
Date

Inspection Summary

Inspection on July 17-20 and 24-27, 1984 (Report No. 50-461/84-21(DRS))

Areas Inspected: Routine announced inspection of preoperational testing QA program, test records, operational staffing, and safety committee activity. The inspection involved a total of 95 inspector-hours onsite by two NRC inspectors.

Results: No items of noncompliance or deviations were identified.

DETAILS

1. Persons Contacted

Licensee Personnel

D. Bowling, Clinton Power Station Records Supervisor
T. Butera, Quality Control Inspector
*R. Campbell, Director, Quality Systems and Audits
*W. Connell, Manager, Quality Assurance
*J. Cook, Assistant Plant Manager, Operations
L. Floyd, Supervisor, Quality Systems
J. Greene, Assistant Plant Manager, Startup
T. Hagenbruch, Senior Compliance Analyst
D. Hall, Vice President
*M. Hassebrock, Director, Quality Engineering and Verification
*D. Herborn, Director, Nuclear Licensing
K. Hill, Quality Assurance Training Coordinator
R. Houston, Station Document Control
S. Kharbanda, Lead Startup Quality Engineer
*J. Loomis, Construction Manager
R. McCurdy, Supervisor, Program Management
*J. Miller, Assistant Startup Supervisor
A. Mueller, Supervisor, Startup
*M. Pacy, Quality Assurance
F. Pegg, Acting Supervisor, Audits
V. Petsas, Station Quality Assurance Specialist
S. Razor, Startup Surveillance
R. Richey, Assistant Plant Manager, Maintenance
D. Rutherford, Lead Auditor
D. Schweickert, Senior Compliance Analyst
R. Seyferth, Lead Auditor
*J. Sprague, Station Quality Assurance Specialist
D. Taylor, Station Quality Assurance Specialist
J. Taylor, Nuclear Records Supervisor
C. Tewksbury, Supervisor, Quality Control
*H. Victor, Manager, Nuclear Station Engineering Department
J. Woten, Supervisor, Compliance and Conformance Control
J. Yowell, Administration Supervisor

Contractor Personnel (Baldwin Associates)

*A. King, Jr., Project Manager
*L. Osborne, Manager, Quality and Technical Services

Other licensee personnel were contacted during the course of the inspection.

*Denotes those persons in attendance at the exit meeting held at the conclusion of the inspection on July 27, 1984.

2. Safety Committee Activity

A review was conducted of the onsite and offsite safety review committees. The establishment, function, and conformance to commitments and requirements were assessed.

a. Documents Reviewed

- (1) Clinton Nuclear Power Station Technical Specifications, Section 6.5, "Review and Audit," Draft
- (2) Illinois Power Company Corporate Nuclear Procedure, CNP 1.09, "Nuclear Safety Reviews," Revision 0
- (3) Clinton Nuclear Power Station FSAR, Section 13.4, "Review and Audit," Amendment 7
- (4) Clinton Nuclear Power Station Procedure OAP 1001.03S, "Facility Review Group," Revision 2
- (5) Clinton Nuclear Power Station Procedure OAP 1001.04S, "Facility Review Group Review of Assigned Documents," Revision 0
- (6) Clinton Nuclear Power Station Procedure OAP 1001.01N, "Clinton Power Station Organization, Responsibilities, and Minimum Qualifications," Revision 1

b. Review Committees Authorization

Section 13.4 of the Clinton FSAR provides that a program for reviews and audits of activities affecting safety is established by the following:

- (1) Onsite review is the responsibility of the Facility Review Group (FRG) which shall be established and functional prior to initial fuel loading.

This group was organized in mid-1982 and currently performs the safety review function. It is mandated by Clinton Power Station (CPS) procedures OAP 1001.03S and OAP 1001.04S.

- (2) The independent review responsibility is assigned to the Nuclear Review and Audit Group (NRAG) which shall be established and functional prior to initial fuel loading. This independent offsite review group had not been established at the time of this inspection but has been authorized by procedure CNP 1.09 Revision 0 dated April 26, 1984, and is expected to be functional in the near future.
- (3) An Independent Safety Engineering Group (ISEG) is also authorized by procedure CNP 1.09 and is not presently established.

c. FRG Activities Review

The NRC inspector performed a review of all meeting minutes generated during the year of 1983. Meeting 83-037 was held on January 6, 1983, with the last meeting (83-085) being held on December 29, 1984. From a review of the records for 49 meeting minutes, the NRC inspector discussed the following issues with licensee personnel:

- (1) Procedures require that the Plant Manager or the designated alternate shall act as the chairman of the FRG. The review established that the Plant Manager had chaired 15 meetings, the Assistant Plant Manager-Operations had chaired 29 meetings, the previous Assistant Plant Manager-Maintenance had chaired two meetings and the current Assistant Plant Manager-Maintenance had chaired three meetings.

The inspector was informed that in the absence of the Plant Manager, the approved chairman alternate order is provided in CPS procedure OAP 1001.01N, Revision 1, Section 8.4 ("Succession of Station Responsibility"). First alternate is the Assistant Plant Manager-Operations and second is the Assistant Plant Manager-Maintenance. It was determined that this order had been followed.

- (2) Procedure OAP 1001.04S, "Facility Review Group Review of Assigned Documents", includes review of NRC correspondence. It was not apparent that such review activity was performed.

The inspector was informed that the NRC items are converted to Condition Reports (CRs), evaluated and investigated, and then the complete package is presented for review by the group as a CR item. An example observed was CR #1-84-06-015, Revision 0, regarding IE Circular 81-03.

- (3) In response to a question concerning trending review by the group, the NRC inspector was informed that trending activities are handled by the QA organizations and the results are being reported to the Vice President. Trending information does not come before the review group for consideration.
- (4) The NRC inspector noted that during three separate meetings, the subject of audit findings review was discussed without resolution. The NRC inspector was informed that the NRAG will conduct audit reviews when that group becomes functional.

The results of a Joint Utility Management Assessment (JUMA) audit conducted in September, 1983, recommended that "...IP Management consider making NRAG functional in very early stages of preoperational phase and ask the Group to review the audit reports for program evaluation. (R-83-08)." The NRC inspector concurred in this recommendation.

Although it was noted that there was one isolated instance of a meeting being conducted without a quorum present, no items of noncompliance or deviations were identified.

3. Preoperational Test Records

A review was conducted of the licensee's record control program for records generated during the preoperational test program to determine compliance with SAR commitments and regulatory requirements and to ascertain adequacy of the implementation of the program.

a. Documents Reviewed

- (1) Clinton FSAR, Section 1.8
- (2) Clinton Power Station Procedure OAP 1117.10S, "Station Record Control," Revision 2
- (3) Clinton Power Station Procedure SAP-4, "Document and Records Control," Revision 9
- (4) Clinton Power Station Procedure OAP 10107.01S, "Plant Records Preparation, Transmittal and Retention," Revision 5
- (5) Clinton Power Station Record Index Matrix, Revision 12

b. Records Control Review

The Clinton FSAR, Section 1.8, commits to Regulatory Guide 1.88 Revision 2, and it endorses ANSI N45.2.9-1974 with the following two exceptions: (1) transitory records will not be stored in facilities or cabinets having NFPA Class A four hour minimum fire rating, and (2) only cabinets with a one hour minimum fire rating can be obtained and shall be used as temporary storage of such records.

The Record Index Matrix (RIM) was discussed with Compliance and Conformance Control personnel. It was determined that each record is controlled by a transmittal form which reflected the department, group or user and included a sequence number. The quality status and retention requirements were also included. The inspector also determined that a new "Record Class Code List," now in process, will replace the RIM.

The Startup Document Center (SDC) and storage vault were inspected and the following observations made:

- (1) A completed preoperational test procedure original was observed to be properly stored (PTP-0G-01 Off Gas Glycol).
- (2) In process records were properly stored in the SDC.
- (3) A closed audit (Number Q38-83-24), conducted of the Compliance and Configuration Control Group, was observed to be properly stored in the vault.
- (4) Reference drawing stick files located in the SDC were reviewed. The inspector observed some drawings on the stick files that were stamped "Superseded". In response to questioning, it was determined that the Test and Startup Engineers had requested that certain old drawings be retained because they contained useful information. All such drawings are controlled by the "Superseded" stamp, in lieu of the controlled copy stamp. The inspector has no further questions regarding this matter.
- (5) A completed test package, ready for preoperational testing, was properly stored in a SDC fire resistant file cabinet.

- (6) Discussion was conducted regarding the promptness for transmittal of records to the vault (CP5 Control File). It was noted that procedures SAP-5, Revision 2 ("Test Procedure Results Review and Approval") and SAP-14, Revision 2 ("Test Procedure Development") both require that completed documents are to be transmitted to the vault in accordance with SAP-4. However, no time frame for transmitting the documents was specified. Completed documents in the SDC appeared to be collecting and no effort to effect transfer was observed. In response to questioning, the inspector was informed that limited storage space in the SDC will require early transfers. Additionally in progress staffing activities will aid the undertaking in the near future. The inspector has no further questions regarding this matter at this time.
- (7) A discussion was conducted regarding the impact of audits and surveillance findings. It was determined that all findings must be submitted to the affected organization. That organization must acknowledge, analyze, and provide response for resolution of the findings.
- (8) The NRC inspector observed that adequate access controls were in effect.

No items of noncompliance or deviations were identified.

4. Preoperational Testing Quality Assurance

A review was conducted of the quality assurance program established for the preoperational testing phase at the Clinton Power Station. The following areas were reviewed during the inspection: management of the quality assurance program, surveillance and inspection efforts, auditing, and training and qualification of quality assurance personnel. At the time of inspection, only one preoperational test had been performed and documented.

a. Documents Reviewed

- (1) Illinois Power Company Operation Quality Assurance Manual, Chapter 1, "Organization", Revision 3
- (2) Illinois Power Company Quality Assurance Manual, Chapter 18, "Audits", Revision 4
- (3) Illinois Power Company Startup Manual, Chapter 8, "Preoperational Phase", Revision 12
- (4) Illinois Power Company Startup Administrative Procedure, SAP-5, "Test Procedure Results Review and Approval", Revision 6
- (5) Illinois Power Company Startup Administrative Procedure, SAP-14, "Test Procedure Development", Revision 2
- (6) Illinois Power Company Startup Administrative Procedure, SAP-15, "Test Release", Revision 0
- (7) Illinois Power Company Startup Administrative Procedure, SAP-16, "Test Change Notice", Revision 0

- (8) Illinois Power Company Startup Instructions, SAI-6, "Generic Testing of System Equipment", Revision 6
- (9) Illinois Power Company Quality Assurance Procedure, QAP 101.01 "Quality Assurance Organization and Responsibilities", Revision 6
- (10) Illinois Power Company Quality Assurance Procedure, QAP 110.02, "Quality Verification Plans", Revision 2
- (11) Illinois Power Company Quality Assurance Procedure, QAP 116.01, "Corrective Action and Response to IP QA Audits", Revision 1
- (12) Illinois Power Company Quality Assurance Procedure, QAP 116.08, "CPS Condition Report", Revision 4
- (13) Illinois Power Company Quality Assurance Procedure, QAP 118.01 "Quality Assurance Audit Program", Revision 4
- (14) Illinois Power Company Quality Assurance Procedure, QAP 118.05 "Quality Assurance Surveillance Program, Revision 8
- (15) Illinois Power Company Quality Assurance Instruction, QAI-401.01 "Quality Engineering Organization, Responsibilities, and Work Assignments", Revision 2
- (16) Illinois Power Company Quality Assurance Instruction, QAI-510.01 "Preparation of Quality Control Inspection Plans", Revision 6
- (17) Illinois Power Company Quality Assurance Instruction, QAI-510.04 "Conduct of Inspections", Revision 5
- (18) Illinois Power Company Quality Assurance Instruction, QAI-511.01 "Inspection of Startup Testing", Revision 4

b. Management of Quality Assurance Program and Quality Verification

The inspector reviewed the Illinois Power Company's Operational Quality Assurance Manual, Startup Manual, Startup Administrative Procedures, Startup Instructions, Quality Assurance Procedures and Quality Assurance Instructions and verified that normal requirements of the Quality Assurance and Quality Verification Program were in accordance with those requirements included in the FSAR. The 1983 Joint Utilities Management Assessment (JUMA) audit was reviewed to determine that the quality assurance program has been regularly audited for adequacy and effectiveness. Throughout the inspection, the inspector interviewed quality assurance supervisors, auditors, specialists, and engineers and verified that the personnel understood their responsibilities.

c. Quality Assurance Surveillance and Inspection

The inspector verified that requirements have been established and responsibilities assigned for the Illinois Power Company Quality Assurance Organization to review and monitor preoperational testing activities. The review and monitor process entails review of procedures and test data by the Quality Engineering Group, surveillance of the actual testing activities by the Quality Startup Surveillance Group, and inspection by the Quality Control Group. The inspector examined the review documentation generated by Quality Engineering for preoperational test PTP-0G-01, "Off Gas Gycol Test." The surveillance report, surveillance findings and corrective action documents for this test were also examined.

d. Audits

The inspector reviewed the quality assurance procedures, the Operational Quality Assurance Manual and the FSAR to verify that responsibilities and requirements have been established. The annual audit schedule for 1984 and the internal third quarter schedule for 1984 were reviewed.

An audit for preoperational testing activities was not scheduled during 1984. In conversations with auditing personnel it was determined that preoperational testing activities could be included in the startup audit scheduled in November. An audit of preoperational testing activities should be planned during the preoperational phase when it can be most effective. Pending review of the audit(s) of preoperational testing activities, this is considered to be an unresolved item (461/84-21-01).

e. Training and Qualification of Quality Assurance Personnel

The inspector verified that qualification requirements have been established by reviewing Illinois Power Company Position Descriptions for Illinois Power Company Quality Assurance (IPQA) supervisors, inspectors, engineers, and specialists. The following personnel records were reviewed to verify that minimum education, experience and qualifications have been met:

- (1) Manager of Quality Assurance
- (2) Five Quality Assurance supervisory positions
- (3) Two Lead Auditors
- (4) Two Surveillance Personnel
- (5) Two Quality Control Inspectors
- (6) Two Quality Engineers

During the review of position descriptions, the inspector found that various position descriptions for non-auditor positions contained an ANSI N45.2.23 (Audit Team Leader) qualification requirement. The personnel records for these positions did not contain evidence of audit team leader training or qualifications. This situation was brought to the attention of IPQA management and the position descriptions were re-evaluated during this inspection.

The training program for Quality Assurance personnel was reviewed to verify that personnel did receive appropriate training.

No items of noncompliance or deviations were identified.

5. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance, or deviations. One unresolved item identified in this report can be found in Paragraph 4.d.

6. Exit Interview

The inspectors met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on July 27, 1984. The purpose, scope and findings of the inspection were discussed.