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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: Response to the Systematic Assessment of Licensee
Performance

Dear Mr. Davis:

This letter provides the Illinois Power Company (IP) response to the U. S. Nuclear Regulatory Commission's (NRC's) eleventh Systematic Assessment of Licensee Performance (SALP 11) for the Clinton Power Station (CPS). SALP 11 covered the period from February 1, 1991 through April 30, 1992.

The SALP 11 report concluded that, overall, CPS performance was good and demonstrated a strong commitment to safety and a conservative operating philosophy. The report also indicated that CPS performance has improved as evidenced by improved ratings in Operations, improving trends in Maintenance/Surveillance and Security, and the reversal of the declining trend in Emergency Preparedness. I am pleased that the NRC has recognized the CPS commitment to safety, conservative operating philosophy, and other identified strengths.

The report also identified areas where management attention would appear to be warranted. These areas include the pursuit of root causes, a broader focus in problem resolution, stronger trending programs, the encouragement of a questioning attitude to ensure recognition of problems, and improvement in communications within and between departments. Illinois Power agrees that management attention is warranted in these areas.

IP's review of the SALP 11 report did identify some areas where additional clarification is necessary. These items are summarized in the attachment to this letter.

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CPS management and staff have a mission to operate Clinton Power Station efficiently and with a strong commitment to safety, reliability, and professionalism. All personnel at CPS are striving for improvement and are encouraged that the NRC recognizes their efforts. IP is committed to making improvements in problem solving, trending capabilities, and communications among and between all areas of the Nuclear Program's activities.

If you have any questions, please contact me.

Sincerely yours,



J. S. Perry
Senior Vice President

MAR/mfm

Attachment

cc: NRC Clinton Licensing Project Manager
NRC Resident Office
Illinois Department of Nuclear Safety

Areas of Clarification Based on Illinois Power's
(IP) Review of SALP 11 Report

In the functional area of Engineering/Technical Support, the report states, "System engineers continued to improve the reliability centered maintenance program, with a predictive maintenance program in place for 10 systems." IP would like to clarify that Reliability Engineering has implemented the reliability centered maintenance program on eleven systems.

Additionally, two examples provided in the report to support NRC positions are incorrect. The positions and the examples provided in the SALP 11 report are stated below:

- Functional Area: Engineering/Technical Support, page 10

"In addition, an occasional failure to recognize that problems with nonsafety-related equipment or functions could affect safety-related functions or equipment occurred.

An example of this was the proposal to shed lighting loads at 60 minutes into a station blackout event to conserve battery capacity."

- Functional Area: Safety Assessment/Quality Verification, page 13

"While generally improved, there were some instances where licensing submittal technical content was inadequate. An example of this was an emergency change to the technical specifications which required several conference calls to resolve technical issues."

As discussed with Messrs. R. Lanksbury and C. Carpenter, these examples should be revised to appropriately describe CPS performance.