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JUL 21 1992

1E-06

Docket No. 50-461
License No. NPF-62
EA 92-110

Illinois Power Company
ATTN: J. S. Perry
Vice President
Clinton Power Station
Mail Code V-275
Post Office Box 678
Clinton, Illinois 61727

Dear Mr. Perry:

This refers to the routine safety inspection conducted from June 1 - 5, 1992, at the Clinton Power Station (Inspection Report No. 50-461/92011). Violations of NRC requirements in the area of radiological controls were identified during the inspection, and an enforcement conference was held on July 14, 1992, in the Region III office. Attending the enforcement conference were you, Dr. Carl J. Paperiello, Deputy Regional Administrator, NRC Region III, and other members of our respective staffs. The report documenting this inspection was mailed to you by letter, dated June 22, 1992.

After a review of the information presented at the Enforcement Conference by you and your staff, we have determined that this matter does not warrant escalated enforcement. However, we remain concerned about: the lack of radiation protection (RP) input into and the control of work scheduling; radiation work permits with untimely survey data and insufficient instructions to workers; weaknesses in the ALARA program including inadequate work plans and poor communications both within the group and with other departments; poor communications within RP and between RP and other groups; and the lack of a questioning attitude displayed by RP supervisors and technicians. Many of these concerns were exhibited not only in the events of May 28 - June 2, 1992, but past events as well. Corrective actions taken for other events including the A residual heat removal (RHR) pump discharge valve (Inspection Report 50-461/90026(DRSS)), the filter pit (Inspection Report 50-461/89037(DRSS)) and the steam separator move (Inspection Report 50-461/92004(DRSS)) were ineffective to preclude recurrence even though the events had similar root causes. In addition, NRC Region III representatives had discussed their concerns about the poor coordination between the ALARA group, job planners and radiation protection with the Director and the Assistant Director at Plant Radiation

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Protection on June 2, 1992, before the work on the TIP recommenced. Had adequate communications between job planners, the ALARA group and those responsible for radiological controls occurred, the events of May 28 through June 2, 1992, may have been prevented. We expect lessons-learned from these events to be incorporated into your overall corrective actions in an attempt to preclude future similar problems. Recurrences of similar problems could result in escalated enforcement in accordance with the NRC Enforcement Policy.

During the course of the inspection (Inspection Report 50-461/92011(DRSS)), certain of your activities appeared to be in violation of NRC requirements, as described in the enclosed Notice. A written response is required. In your required written response to the Notice of Violation please address the above mentioned concerns as well as the concerns raised at the Enforcement Conference.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response will be placed in the NRC Public Document Room.

The response directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Public Law No. 96-511.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

ORIGINAL SIGNED BY CHARLES E. NOBELIUS

Charles E. Norelius, Director
Division Of Radiation Safety
and Safeguards

1E-06

Enclosures:

- 1. Notice of Violation
- 2. Enforcement Conference Report
No. 50-461/92015(DRSS)

See Attached Distribution:

RIII	RIII	RIII	RIII	RIII	RIII
<i>← see attached for prior concurrences →</i>					
Nelson/jp	Snell	Lanksbury	Pederson	DeFayette	Norelius
07/	192				7/21/92

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of Plant Radiation Protection on June 2, 1992, before the work on the TIP recommenced. Had adequate communications between job planners, the ALARA group and those responsible for radiological controls occurred, the events of May 28 through June 2, 1992, may have been prevented. We expect lessons-learned from these events to be incorporated into your overall corrective actions in an attempt to preclude future similar problems. Recurrences of similar problems could result in escalated enforcement in accordance with the NRC Enforcement Policy.

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Sincerely,

Charles E. Norelius, Director
Division Of Radiation Safety
and Safeguards

Enclosures:

- 1. Notice of Violation
- 2. Enforcement Conference Report
No. 50-461/92015(DRSS)

See Attached Distribution:

bcc: J. Lieberman OF
J. Parlow, NEE
S. Goldberg, OGC

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07/20/92

Shell
7/20/92

Lanksbury

Pederson
7/20/92

DeFayette Norelius
7/20/92

Distribution:

cc/enclosures:

J. Cook, Manager
Clinton Power Station
F. Spangenberg, III, Manager
Licensing and Safety
DCD/DCB (RIDS)
Resident Inspector, Region III
Licensing Project Manager, NRR
J. McCaffrey, Chief
Public Utilities Division
Patricia O'Brien, Governor's
Office of Consumer Affairs
S. Zabel, Esq., Schiff, Hardin
and Waite
K. K. Berry, Licensing Services
Manager, General Electric
Chairman, DeWitt County Board
Illinois Department of
Nuclear Safety
Robert Newmann, Office of Public
Counsel, State of Illinois
Perry SRI

bcc: J. Lieberman, OE
J. Partlow, NRR
J. Goldberg, OGS