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STATE OF ILLINOIS
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October 26, 1984

Mr. James L. Milhoan
Section Chief, Licensing Section
Quality Assurance Branch
Office of Inspections and Enforcement
Mail Stop EWS-305A
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Clinton Power Station Independent Design Review-
IDR Progress Meeting of October 16, 1984

Dear Mr. Milhoan:

I am writing in response to your request for the State of Illinois' comments on the first progress report of Bechtel Power Corporation (BPC) in the above-referenced matter. Because our comments were presented on the record at the October 16, 1984 meeting, I will not repeat or summarize them in their entirety. However, I would reiterate three particular areas of concern to the State of Illinois.

Firstly, we request an opportunity to inspect the primary documentation generated during the course of the IDR. This would include check lists, commitment lists, review sheets, and all other working files of BPC in the conduct of the IDR. Without access to this documentation, we believe the IDR reports are essentially inscrutable.

Secondly, it is unclear whether substantive discussions between BPC and Sargent & Lundy or Illinois Power Company will be held during "working meetings" that may occur after an observation has been reported. We believe that any such discussions should be subject to the prior notice and opportunity-to-attend requirements of the IDR protocol.

Thirdly, we are especially concerned about Sargent & Lundy's role in the IDR. Recent Observation Reports confirm our initial impression that it is Sargent & Lundy, rather than

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the independent reviewer, who is conducting important aspects of the IDR program. See, for example, observation report no. 10, dated October 12, 1984:

"S&L should provide an explanation of why these discrepancies occurred, and an assessment of their safety significance. S&L should identify similar applications of using interruptable control power in the control circuits of other safety related systems and verify that the design commitments are implemented in the design to ensure design adequacy.";

and observation report no. 11, dated October 12, 1984:

"S&L should provide an explanation of why these discrepancies occurred, and an assessment of their safety significance. S&L should review other layout drawings and evaluate the implication on other systems and areas if similar discrepancies occur elsewhere."

We would be interested in learning whether, in the judgment of NRC, the IDR is being conducted with the requisite independence and "freedom from outside influence", on the scope of the reviewer's work, in the processing of observations, the determination of their safety significance, the need for more intensive review, and in the evaluation for underlying, root causes or broader implications. (See IDR Program Plan, Rev. 1, page 3, par. 2 and page 6, par. 1.)

The State of Illinois would also request copies of the following documents which have been referenced in recent IDR correspondence:

- (1) the Sargent & Lundy analysis of the four independent reviews of S&L design activities, as specified in correspondence dated October 11, 1984 from D.P. Hall to James L. Milhoan (U-0750);
- (2) the "point papers" developed by Illinois Power Company in response to the twenty engineering design areas identified by Stone & Webster; reference D.P. Hall to James L. Milhoan dated September 28, 1984 (U-0741); and
- (3) each of the reviews of Sargent & Lundy design activities which are being provided to BPC in the conduct of the IDR.

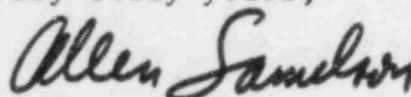
Mr. Milhoan

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The State of Illinois appreciates the opportunity to attend the IDR progress report meetings and to present our comments. I look forward to receiving a copy of the transcript of the October 16, 1984 meeting.

Very truly yours,



Allen Samelson
Assistant Attorney General
Environmental Control Division

AS:dm

cc: Attached distribution list

Clinton Power Station

Independent Design Review
Standard Distribution List

(cc w/o Enclosures)

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