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March 30, 1984

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Goddard/Patterson
 Re:is
 FF

Richard J. Goddard, Esq.
 Office of the Legal Director
 U.S. Nuclear Regulatory Commission
 Washington, D.C. 20555

Re: Illinois Power Co. (Clinton Power Station), 50-461 OL

Dear Mr. Goddard:

I am writing as part of our continuing informal discussions concerning settlement of Contention III in the above captioned proceeding.

Enclosed is Illinois' proposal to revise Contention III. This proposal sets forth the specific concerns that Illinois has at this time about the control room at the Clinton Power Station. We wish to discuss this proposal during our next meeting, which is scheduled for April 11, 1984.

Please note that our proposal includes the dismissal of the current Contention III (c), which, of course, requires Prairie Alliance's concurrence.

I am also writing to confirm your representation that the NRC Staff will make available a transcript of the meeting, scheduled to take place in Bethesda, Maryland on April 5, 1984, on the Clinton Power Station Safety Parameter Display System. Please call Allen Samelson if this is not the case.

Yours truly,

Philip L. Willman

PHILIP L. WILLMAN
 Assistant Attorney General
 Environmental Control Division

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Encl.

cc: Sheldon Zabel
 Jean Foy

Proposed Contention III

III. The design and fabrication of the Clinton Power Station (CPS) control room layout and instrumentation have not been modified to meet current regulatory requirements. Specifically:

(a) The reactor pressure vessel water level measurement devices are deficient in that they fail to meet the provisions of Reg. Guide 1.97, Revision 3 as follows:

- (1) The devices for the upset range and the fuel zone range are not environmentally qualified over their entire range, and therefore fail to comply with 10 CFR 50.49 and the provisions in Reg. Guide 1.89 and Reg. Guide 1.97.
- (2) The upper 56 inches between the upper end of the wide range level instrumentation and below the centerline of the main stream line is not monitored by redundant instruments. Thus it does not comply with the provisions of Reg. Guide 1.97.
- (3) Important monitors in the fuel zone range level instrumentation and the upset range instrumentation are not powered by station standby sources. Thus they do not meet the provisions of Reg. Guide 1.97.

(b) The method for detecting inadequate core cooling is deficient because it relies heavily upon the reactor pressure vessel water level monitoring instrumentation. This instrumentation is neither totally qualified, powered by Class IE Power sources or redundant over the entire range. Thus it does not meet the provisions of NUREG-0727, item II.F.2, and Reg. Guide 1.97.

(c) (deleted)

(d) The Safety Parameter Display System (SPDS) is deficient because:

- (1) Computer signals have not been shown to be adequately isolated from other safety-related signals. There is no assurance that failures in the SPDS will not affect safety related signals and functions. Thus it does not comply with 10 CFR 50, App. A, GDC 24.
- (2) The color yellow is not used consistently between the ARM/PRM displays and the SPDS display (2/10/84, IP to NRC, U-0695, 2.2.6). IP therefore fails to conform to the provisions of NUREG-0700, Sections 6.5.1.6 and 6.7.2.7.
- (3) Although limited time-history information is available in the form of rate of change data and trending capabilities (2/10/84, IP to NRC, U-0695, 2.6.3), the SPDS does not appear to readily provide a 30 minute time-history display of the necessary parameters following an accident.

Thus it does not meet the provisions of NUREG-0835, Section 3.2.

- (4) The AR/PR display, as illustrated in Appendix 3 of 2/10/84, IP to NRC, U-0695, is located adjacent to the Standby Information Panel (Figure 2, IP to NRC, U-0695) and is not readily visible or accessible to an operator at the control console. The CPS therefore does not comply with the provisions of NUREG-0835, Section 4.4.3.1.b.
- (5) The NRC has not yet verified compliance of the Clinton Power Station with Generic Letter 82-33.

(e) *The CPS lacks adequate instrumentation for monitoring*
(d) ~~The CPS does not meet the provisions of Reg. Guide 1.97 because:~~
accident conditions, in that:

- ~~(1) IP states that the CPS will comply with Reg. Guide 1.97, Revision 3 (9/9/83, IP to NRC, U-0633), but the NRC intends to review CPS' compliance with Reg. Guide 1.97, Revision 2 (1/25/84, Rosa to Goddard).~~
- (1) (2) The CPS reactor pressure vessel water level monitoring equipment (IP parameter designation A2) is deficient, as described above.
- (2) (3) There are no data in IP's "Compliance Report on Reg. Guide 1.97 [Revision 3]" (9/9/83, U-0633) to show IP's compliance with five design and

qualification criteria for accident monitoring instrumentation found in Reg. Guide 1.97, Revision 3. Those criteria are: channel availability, equipment identification; interfaces; servicing, testing and calibration; and direct measurement.

- (3) (4) Compliance with Reg. Guide 1.97 is not verified because the NRC has not yet completed its review.