

U-600155
L30-85(06-14)-L
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ILLINOIS POWER COMPANY



CLINTON POWER STATION, P.O. BOX 678, CLINTON, ILLINOIS 61727

June 14, 1985

Docket No. 50-461

Director of Nuclear Reactor Regulation
Attn: Mr. W. R. Butler, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: NRC Generic Letter 83-28
Salem ATWS Events

Dear Mr. Butler:

In letter U-0743, dated October 1, 1984, Illinois Power submitted its response to Generic Letter 83-28. Subsequent to that submittal, Mr. Byron Siegel, NRC Clinton Licensing Project Manager, requested additional clarification of Sections 3.1 and 3.2 of our response. The following is a summary of the clarifications requested and Clinton Power Station's supplemental responses:

COMMENT

The IP response to Sections 3.1 and 3.2 of Generic Letter 83-28 does not include a statement that a review of maintenance procedures was conducted and that the generic post maintenance testing included in Clinton Power Station maintenance and test procedures adequately includes the recommendations of equipment vendors.

RESPONSE

Procedures of this type fall into two categories at CPS: maintenance procedures and surveillance test procedures. Adequate post maintenance testing (PMT) cannot be assured by relying solely on generic PMT requirements included in a procedure due to the dependence on the troubleshooting process as well as the actual repair. To insure adequate PMT, Illinois Power has established a process which uniquely determines the PMT required for each maintenance evolution on safety-related equipment.

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The PMT requirements included in the maintenance and surveillance test procedures affecting safety-related equipment have received reviews by the following organizations prior to final approval: cognizant maintenance Group Supervisor, Assistant Power Plant Manager - Maintenance, CPS Technical Department, Quality Assurance Department, and the Facility Review Group. The sources of vendor recommendations which were included in each procedure are documented in the reference section of the procedure, and have been entered into a computerized Procedure Cross Reference (PCR) which permits a rapid bidirectional cross reference between vendor documents and procedures. The diversity of reviewing organizations and the establishment of the automated cross reference-to-vendor equipment manuals provides IP with reasonable assurance that vendor recommendations have been properly considered in the development of CPS Maintenance and Surveillance Test procedures, and that changes to vendor source documents can be quickly assessed to identify the procedures which may be affected.

A flowchart (Attachment 1) is provided as an aid to understanding how the measures described above work in concert to provide this assurance.

COMMENT

Describe how the recommendations of equipment vendors have been incorporated into the development of CPS Technical Specifications.

RESPONSE

The CPS Technical Specifications are based upon the NRC generic BWR-6 Standard Technical Specifications (STS) as modified to be CPS specific. The development process which is modifying the STS has at its focus a working group of representatives from the NSSS vendor (General Electric), the Architect/Engineer (Sargent & Lundy), Nuclear Station Engineering Department, and CPS Plant Staff. The recommendations of vendors are incorporated directly through the representatives of this group and various other methods such as: the detailed review of CPS surveillance procedures by the Technical Department, the INPO operating experience evaluation program, participation in the BWROG Technical Specification Improvements Subcommittee, formal evaluation of vendor updates by the program developed to address the Salem ATWS concerns, and the CPS Condition Report system which requires a complete investigation of the failure of any safety related component.

At the heart of the CPS Technical Specification development process is an automated data base called the Technical Specification Commitment Control Program (TSCCP). TSCCP is an automated cross reference system which links each specification to supporting source documentation and implementing procedures. Through this data base, direct and indirect ties exist between each specification and vendor recommendations. Direct ties exist to vendor documents which serve as source information for such items as component setpoints and allowed values of operating parameters (e.g. pressure, voltage, etc.). Indirect vendor documents used to develop plant procedures are tracked in the Procedure Cross Reference described in the response to the previous comment.

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A flowchart is provided (Attachment 2) to illustrate the review process and the relationship of the automated data base.

Sincerely yours,



F. A. Spangenberg
Director - Nuclear Licensing
and Configuration
Nuclear Station Engineering

SMK/lab

Attachments

cc: Regional Administrator, Region III, USNRC
B. L. Siegel, NRC Clinton Licensing Project Manager
NRC Resident Office
NRC Document Control Desk, Washington DC 20555
Illinois Department of Nuclear Safety

Review Process for Safety Related Maintenance Department Procedures



