

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-461/86003(DRS)

Docket No. 50-461

License No. CPPR-137

Licensee: Illinois Power Company
500 South 27th Street
Decatur, IL 62525

Facility Name: Clinton Nuclear Power Station, Unit 1

Inspection At: Clinton Site, Clinton, IL

Inspection Conducted: January 27-30, February 3-7, 10-13, 24-27, 1986

Inspector: *[Signature]*
R. N. Sutphin

3/17/86
Date

Approved By: *[Signature]*
F. C. Hawkins, Chief
Quality Assurance Programs Section

3/17/86
Date

Inspection Summary

Inspection on January 27-30, February 3-7, 10-13, 24-27, 1986 (Report No. 50-461/86003(DRS))

Areas Inspected: Special announced inspection by one regional inspector of licensee action on previous inspection findings and the construction records verification program.

Results: The inspector identified no violations or deviations.

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DETAILS

1. Persons Contacted

Illinois Power Company

- *W. C. Gerstner, Executive Vice President
- *D. P. Hall, Vice President
- *J. E. Loomis, Construction Manager
- *H. E. Daniels Jr., Project Manager
- *J. W. Wilson, Plant Manager
- *J. S. Perry, Manager, Nuclear Program Coordination
- *J. H. Greene, Manager of Startup
- *D. C. Shelton, Manager, Nuclear Safety and Engineering Analysis
- *F. A. Spangenberg, Manager, Licensing and Safety
- *W. Connell, Manager, Quality Assurance
- *N. C. Williams, Director, Support Services
- *R. Cowley, Assistant Director, Support Services
- *U. F. Palchak, Supervisor, Plant Support Services
- *J. C. Wemlinger, Supervisor, Instruction
- *K. A. Baker, Supervisor, I&E Interface
- G. L. Baker, IPQA Records Coordinator

Soyland/Wipco

- *J. Greenwood, Manager, Power Supply

U.S. NRC

- *T. P. Gwynn, Chief, Reactor Projects Section 1B

Baldwin Associates

- *D. J. Schlatka, Project Manager
- *J. V. Hawkins, Manager of Quality Assurance
- *J. L. Thompson, Manager of Quality Engineering

*Denotes those in attendance at the exit interview on February 27, 1986.

Other personnel were contacted as a matter of routine during the inspection.

2. Action on Previous Inspection Findings

- a. (Closed) Unresolved Item (461/84002-04): Acceptability and justification of record review generic resolutions. The licensee had conducted the necessary reviews and had established a final position on all of the recommendations made by Dennis Millican and Associates Incorporated. The inspector was satisfied that the licensee had satisfactorily addressed this issue.

- b. (Closed) Open Item (461/85016-06): Records Classification Code List (RCCL) not complete, and up-to-date. The licensee had added to the RCCL those items referenced in the FSAR as records commitments and released an up-to-date revision. The inspector was satisfied that the licensee was appropriately addressing this issue.

3. Inspection of Records Verification Program

The inspector examined the results of the licensee's special Records Verification (RV) Program (RVP) to verify that the program had accomplished the intended objectives and was essentially completed in accordance with commitments to the NRC. The RVP was intended to augment the normal Clinton Power Station (CPS) Quality Assurance (QA) records program and provide additional assurance on the acceptability of the CPS Construction QA records.

The licensee had advised Region III in their letter of November 15, 1985, that the results of the RVP indicated that there were no safety significant nonconformances (NCR's) identified as a result of the RVP reviews, no difficulties that had adverse implications on hardware quality, and that there was an adequate level of confidence in the acceptability of the CPS Construction QA records. The licensee arrived at these conclusions after completing more than 80% of the planned RV reviews. As a result of these conclusions, the licensee proposed to discontinue further RV reviews at an appropriate point of completion in the various record categories and terminate the program subject to NRC comments.

The objective of this inspection was to provide the basis for the NRC position in this matter and include NRC comments and recommendations regarding the termination of the special construction RVP at this time.

a. Procedures and Documents Reviewed

- (1) CNP 1.14, Revision 0, "Records Management"
- (2) RMS STND No. 1.01, Revision 1, "Preparation and Control of RMS Standards"
- (3) RMS STND No. 1.02, Revision 1, "Development of the Required Records List"
- (4) RMS STND No. 2.01, Revision 0, "Standard for the Collection and Review of Records"
- (5) RMS STND No. 2.02, Revision 2, "Standard for Record Quality"
- (6) RMS STND No. 2.03, Revision 0, "Disposition of Record Deficiencies"
- (7) RMS STND No. 2.04, Revision 1, "Records Turnover/Transfer"

- (8) RMS STND No. 3.01, Revision 1, "Maintenance of CPS Records Classification Code List (RCCL)"
- (9) RMS STND No. 3.02, Revision 1, "Records Storage, Preservation and Maintenance"
- (10) CPS U-600214, Revision 3, "Record Verification Program Plan"
- (11) Baldwin Associates (BA) QA Training Manual - Appendix 3, Revision 1, "Document Review Personnel"
- (12) BAP 2.1.1, Revision 6, "Verification of BA Records"
- (13) BAP 2.1.2, Revision 2, "Verification of BA Procurement and Subcontractor Documentation"
- (14) BAP 2.1.3, Revision 1, "QA Final Review Checklists"
- (15) BAP 2.1.4, Revision 2, "Final Document Review Status, Tracking and Trending"
- (16) BAP 2.1.5, Revision 0, "Generic Resolution Management"
- (17) NP&S 1.01, Revision 0, "Preparation and Control of Nuclear Planning and Support Department Procedures"
- (18) NP&S 2.50, Revision 0, "Records Processing and Maintenance"
- (19) NP&S 2.51, Revision 0, "Document Control Procedure"
- (20) NP&S 5.04, Revision 0, "Records Control"
- (21) NS 1.01, Revision 1, "Preparation and Control of Nuclear Support Department Procedures"
- (22) NTD Procedure 1.9, Revision 1, "Nuclear Training Department Records Control"
- (23) CPS No. 1017.01, Revision 6, "Plant Records Preparation, Transmittal and Retention"
- (24) PMP 7.1, Revision D, "Records Control"
- (25) NSED Procedure A0, Revision 8, "Nuclear Station Engineering Department Procedures/Instructions"
- (26) NSED Procedure A1, Revision 4, "Document/Correspondence Administration"
- (27) NSEI R-1, Revision 6, "Transmittal of Records to Nuclear Support Records Management Group (RMG)"

- (28) QAP 117.01, Revision 4, "Records Control"
- (29) SAI-4, Revision 10, "Document and Records Control"
- (30) Emergency Planning (Draft Procedure) 1.02, "Control of Nuclear Program Coordination Records"
- (31) Corrective Action Requests (CARs) numbered 138, 145, 150, 162, 173, 207, 227, 230, 240, 259, 256, and 258

b. Program Areas Inspected and Results

(1) RV Program Definition and Controls

The inspector reviewed the procedures and instructions relating to the definition and control of the RVP for construction QA records and found them to be acceptable. The licensee had developed a comprehensive program plan with effective controls. The plan included not only those measures necessary to provide for the review process, but also included appropriate audits, surveillances, and a 20% sampling plan to verify that the reviews were completed in an acceptable manner and in accordance with program objectives.

(2) Implementation Status

The inspector reviewed the pertinent program implementation information and found that the program had been initiated and conducted in accordance with the RVP plan. Information generated by the licensee using computer data processing methods in September 1985, provided an appropriate basis for an assessment of the status and success of the program.

This data indicated that the RV program was over 80% complete and that no significant safety-related record deficiencies had been identified. The many minor deficiencies that were identified were assigned to appropriate problem resolvers for investigation, correction, and resolution. The impact on hardware was minimal. Engineering personnel and consultants had evaluated all problems documented by nonconformance reports (NCRs) that may have had a potential adverse impact on hardware or safety.

As an update to the September 1985, data, the inspector also reviewed the data generated as of February 1986. This final data was an indication of the status of the RVP at its conclusion.

(3) Generic Resolution Activity

The inspector reviewed the Generic Resolution (GR) process employed by the licensee's Document Review Group (DRG). A

Generic Resolution was defined as a documented resolution approved by management for a generic problem.

A generic problem was defined as repetitive document exceptions whose causes, effects, and resolutions were closely related. DRG personnel listed all document exceptions and the GRs if used on a Document Exception List (DEL) form, and the DEL became a permanent part of the record package. A consultant had been employed to evaluate and comment on the individual generic resolutions early in the program. The inspector made a detailed review of the consultants recommendations and the licensee's responses. Of 127 GRs proposed, only 30 were accepted for regular continued use in the RVP.

(4) Document Review Checklists

The inspector examined the instructions and procedures associated with the development, approval and use of checklists. He found that appropriate checklists were developed and used. There were six functional areas of construction disciplines. A random sampling process was used to select and review the actual completion and use of the checklists in all of the functional areas. Each item on the checklists was considered to be an attribute and was used to generate the statistical data on the progress and success of the RVP. Checklists were included in handbooks and issued to document reviewers as required for their assigned work.

(5) Document Exception Lists (DELs) and Record Packages

The inspector reviewed approximately 100 record packages and the associated DELs. The packages were selected by a random selection process covering the six functional areas and 17 major types of records. The inspector found that the licensee had a DEL attached to 100% of the records reviewed. Each DEL was attached and properly signed off by Level II reviewers, even when there were no exceptions found in a record package. The licensee was able to retrieve all referenced information and supporting data for resolution of all the inspector's questions. Each record package was indexed and the accountability for all required items was 100%.

(6) Qualifications of Document Review Personnel

The inspector reviewed the list of all individuals certified as either Level II or Level III Quality Assurance Engineers (QAE) (Document Reviewers). He selected a sample of 50% for a detailed qualifications check. Those selected included reviewers in the functional areas of electrical, civil/structural, piping/mechanical, and procurement/subcontracts. The qualification records reviewed included all the necessary information to establish the basis for their certifications. The records included results of exams, education information

and experience, military experience, previous nuclear plant experience, training, on the job training, and practical demonstrations, all in accordance with the RVP plans and procedures.

(7) Nonconformance Reports (NCRs) and Dispositions

The inspector selected a 10% random sample of the NCRs that required an engineering evaluation for disposition and closeout. There were 333 NCRs in this group. The group was divided into nine different categories. The 10% random sample process was applied to each of the nine categories.

The inspector checked the overall adequacy and final dispositions of the sampled NCRs and reviewed in detail the basis for any "USE-AS-IS" dispositions. In each sample the basis and supporting information for the USE-AS-IS dispositions were found to be acceptable and in accordance with the applicable NCR procedures.

(8) Audits and Surveillances

The inspector reviewed the results of 100% of the licensee's QA audits performed in the records activities areas during 1983, 1984, and 1985. A 25% sample of surveillances was also reviewed. The inspector found that the surveillances were particularly effective in the identification of detail problems with the records and the audits were effective in the assessment of the overall program performance to procedures and QA program commitments. All findings were addressed in an acceptable manner, and the process seemed to have a favorable impact on the performance of the records review programs.

(9) Corrective Actions and Generic Resolutions

The inspector reviewed 12 Corrective Action Request (CAR) record files that were associated with generic resolutions and other RV program activities. The inspector found that the CARs were processed in accordance with requirements and had a generally favorable impact on the resolution of problems. The problems were identified both in the administration and management of the RV programs and in the handling of detailed records problems; some of which were associated with the development, approval, training implementation, and retirement of generic resolutions.

(10) Implementation of Normal Records Programs

The inspector reviewed a sample of 60 records packages, ten each from the six functional areas, to verify the overall adequacy of records preparation, processing and reviews. Six NCRs were included in this group to verify the normal processing and dispositions of NCR's other than those generated as a result of the RVP.

The inspector reviewed the internal Records Management procedures of the following departments:

- (a) Plant Staff
- (b) Training
- (c) Project Management
- (d) Nuclear Station Engineering (NSED)
- (e) Nuclear Planning & Support (NP&S)
- (f) Quality Assurance
- (g) Emergency Planning
- (h) Startup

They were found to be generally in accordance with the corporate policy and commitments for records management.

Each department was required to have a records coordinator and alternates. The inspector interviewed 12 individuals assigned to these functions. Those who were the regular records coordinators were found to be knowledgeable and experienced in performing the records responsibilities assigned. Those assigned as alternates were found to be in need of more regular participation to either maintain or develop their proficiency. The NRC inspector did not consider this to be a significant item of concern at this time.

c. Conclusions and Comments on DVP

The licensee's Records Verification Program activity was implemented in accordance with their commitments to the NRC and their program plans. The conclusions reached by the licensee in November 1985 were essentially correct. The inspector found no safety significant nonconformances identified as a result of the RVP reviews, no document exceptions that had an adverse impact on hardware quality or acceptability, and that there was an adequate level of confidence in the acceptability of the construction QA records. The inspection also determined that the normal records management personnel, procedures, and programs were established in an acceptable manner to maintain this condition.

The decision by the licensee to terminate the special records verification program because of its good results and completion status was well supported. Based on this inspection, the NRC concurs with the licensee's termination of the RVP.

4. Exit Meeting

The inspector met with licensee representatives (denoted in the Persons Contacted paragraph) at Clinton on February 27, 1986, at the conclusion of the inspection. The inspector summarized the scope and findings of the inspection. The probable contents of the report were discussed with licensee personnel and no proprietary information was identified.