U-600353 L42-85(12-11)-L 1A.120

ILLINOIS POWER COMPANY

[]p

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

December 11, 1985

Mr. J. G. Keppler Regional Administrator Region III U.S. Nuclear Regulatory Commission 799 Roosevelt Road Glen Ellyn, Illinois 60137

Subject: Response to the Notice of Violation, dated November 4, 1985 in I & E Inspection Report 50-461/85048

Dear Mr. Keppler:

This letter is in response to the November 4, 1985, letter which identified certain activities that had appeared to be in noncompliance with NRC requirements. Attachment A provides Illinois Power Company's response to an apparent failure to confirm design safety requirements.

The issue identified in the November 4, 1985 letter relating to how 10CFR50.62 requirements are implemented, identified in the Inspection Report as an unresolved item, is under investigation. A detailed explanation of our program which ensures t is implementation will be forthcoming.

I trust that our response is satisfactory to ensure compliance with regulatory requirements.

Sincerely yours,

F. A. Spangenberg Manager - Licensing and Safety

DEC 1 2 1985

DJC/kaf

Attachment

cc: B. L. Siegel, NRC Clinton Licensing Project Manager Director, Office of I&E, Washington, DC 20555 NRC Resident Office Illinois Department of Nuclear Safety

8601270218 851220 PDR ADOCK 05000461 9 PDR

U-600353 L42-85(12-11)-L 1A.120

Attachment A Illinois Power Company Clinton Power Station

Subject: Failure to Confirm Design Safety Requirements

The Notice of Violation states in part:

". . . the following example of a failure to confirm the design safety requirements of the Standby Liquid Control System (SLCS) as a result of inadequate preoperational test program implementation was identified:

The test methodology used in PTP-SC-01, "Standby Liquid Control System," to demonstrate that the Standby Liquid Control System (SLCS) boron solution storage tank air sparger would perform as designed was inadequate in that it did not demonstrate that it was capable of mixing the boron solution after the maximum time allowed between Technical Specification (TS) surveillances (38-39 days). In addition, it did not determine how much sparging time is required to ensure that the samples taken for the TS surveillances are representative of the tank contents (461/85048-01)."

I. Corrective Actions Taken and Results Achieved

PTP-SC-01 was written using the criteria of the Final Safety Analysis Report (FSAR) section 14.2.12.1.3, Regulatory Guide 1.68, and the General Electric Test Specification for Standby Liquid Control (SLC). In addition, prior to performing PTP-SC-01, Startup reviewed the procedure for adequacy against the NRC Inspection Module for "Standby Liquid Control System Test." This review was for technical adequacy and to ensure that the test procedure adequately addressed the NRC requirements and licensee commitments relating to the SLC System. The results of this review verified that PTP-SC-01 complied with the requirements and commitments. As such, Illinois Power Company believed PTP-SC-01 was adequate, based on the criteria available at the time the procedure was approved, including the provisions for verifying the capability of mixing the sodium pentaborate solution to uniformity.

After receiving and evaluating the NRC input discussed in the inspection report, Illinois Power Company recognizes the merit of the suggested test verification activities, and has revised PTP-SC-Ol to provide further assurance that the SLC System design provides adequate chemical mixing in the manner described in the Inspection Report.

11. Corrective Actions Taken to Prevent Recurrence

Illinois Power Company believes this to be an isolated occurrence of failure to confirm the design safety requirements using a test procedure that verifies system operability in a manner acceptable to the NRC. Even though the test methodology did not duplicate the conditions of the Technical Specification surveillances, it did verify adequate mixing of the tank contents, as required via the FSAR commitment to Regulatory Guide 1.63.

U-600353 L42-85(12-11)-L 1A.120

Attachment A Illinois Power Company Clinton Power Station

III. Date By When Full Compliance Will Be Achieved

٠.

PTP-SC-Ol has been revised to incorporate the additional test verification activities.

The applicable portion of PTP-SC-01 that was affected by this revision will be performed prior to receipt of the CPS Operating License.

Illinois Power Company will be in full compliance prior to fuel load and no later than March 29, 1986.